ORIGINAL

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SYMANTEC CORPORATION

UNITED STATES DISTRICT COURT FOR THE

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

CV04-3017 GHK (Ex)

SYMANTEC CORPORATION, Plaintiff, vs. JAMES RENO; SAM JAIN; KAREN SENA; BYTEHOSTING INTERNET SERVICES, LLC, an Ohio limited liability company; PROMOTIONAL MANAGEMENT CONSULTING INCORPORATED, an entity of unknown organizational form; INNOVATIVE MARKETING, INC., an entity of unknown organizational form; and DOES 1-50, inclusive, Defendants.	Case No. **COMPLAINT FOR:** **(1) TRADEMARK INFRINGEMENT** **(2) FALSE DESIGNATION OF ORIGIN – LANHAM ACT § 43(a); 15 U.S.C. § 1125** **(3) COPYRIGHT INFRINGEMENT** **(4) FRAUD** **(5) UNFAIR COMPETITION (B&P § 17200, et seq.)** **(6) COMMON LAW UNFAIR COMPETITION** **(7) STATE LAW FALSE ADVERTISING** **(8) INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE** **(9) NEGLIGENT INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE** **[JURY TRIAL DEMANDED]**

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SUBJECT MATTER JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over the claims in this action which relate to copyright, trademark and federal unfair competition laws pursuant to the provisions of 15 U.S.C. §1121, 28 U.S.C. §1338 and 28 U.S.C. §1331.

2. This Court has supplemental jurisdiction over the claims in this complaint which arise under the statutory and common law of the State of California pursuant to 28 U.S.C. §1367(a), since the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

3. Venue is proper in this Court pursuant to 28 U.S.C. §1391(b). Software that is the subject of this complaint was mailed to customers in Los Angeles County. The infringing products which are the subject of this litigation were distributed and/or offered for distribution in the Central District of California, and the claims alleged in this action arose in the Central District of California.

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PARTIES

4. Plaintiff Symantec Corporation ("Plaintiff" or "Symantec") is, and at all times herein mentioned was, a corporation organized and existing under the laws of the State of Delaware, and qualified to do business in California.

5. Plaintiff is informed and believes and on that basis alleges that defendant James Reno ("Reno") is an individual with his principal residence and his principal business address in Ohio, who sometimes conducts business and personal affairs under numerous fictitious names, as described in this Complaint. Plaintiff may seek to amend this complaint to add additional such fictitious names when they are ascertained.

6. Plaintiff is informed and believes and on that basis alleges that defendant Sam Jain ("Jain") is an individual with his principal residence and his

principal business address in Ohio, who sometimes conducts business and personal affairs under numerous fictitious names, as described in this Complaint. Plaintiff may seek to amend this complaint to add additional such fictitious names when they are ascertained.

7. Plaintiff is informed and believes and on that basis alleges that defendant Bytehosting Internet Services, LLC ("Bytehosting"), is a limited liability company organized and existing under the laws of the state of Ohio, with principal business offices in Amelia, Ohio and mailing address at PO Box 104, Amelia, Ohio 45102.

8. Plaintiff is informed and believes and on that basis alleges that defendant Bytehosting also uses a mailing address at PO Box 820, Amelia, Ohio 45102.

9. Plaintiff is informed and believes and on that basis alleges that defendant Karen Sena ("Sena") is an individual with principal residence and principal business address in Ohio, and is a "member" or a "manager" of Bytehosting as those terms are defined under Ohio limited liability company law.

10. Plaintiff is informed and believes and on that basis alleges that defendant Reno founded Bytehosting and has managed and controlled Bytehosting at all times relevant to this Complaint.

11. Plaintiff is informed and believes and on that basis alleges that defendant Promotional Management Consulting Incorporated is an entity of unknown organizational form controlled by one or more of the other defendants.

12. Plaintiff is informed and believes and on that basis alleges that defendant Innovative Marketing, Inc. is an entity of unknown organizational form controlled by one or more of the other defendants.

13. Plaintiff is unaware of the true names and capacities of the defendants sued herein under the fictitious names DOE 1 - DOE 50, inclusive. Plaintiff will seek leave to amend to state the true names and capacities of such defendants

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when such information is ascertained.

14. Plaintiff is informed and believes and on that basis alleges that at all times material herein, each of the defendants was the agent, employee, and/or representative of each of the remaining defendants, and, in doing the things alleged herein, was acting within the scope of such agency, employment, or representation.

15. Plaintiff is informed and believes and on that basis alleges that the defendants have sometimes acted as alleged in this Complaint using one or more of the following fictitious names:

Discount Bob

discountbob.com

bytehosting.com

Innovative Marketing, Inc.

Professional Management Consulting Incorporated

PMMCI

pmmci.com

WinAntiVirus

winantivirus.com

16. Plaintiff is informed and believes and on that basis alleges that defendants have sometimes acted as alleged in this Complaint using one or more fictitious names in addition to those set forth above. Plaintiff will amend this Complaint as appropriate when such additional fictitious names are ascertained.

17. Plaintiff is informed and believes and on that basis alleges that defendant Reno, in his capacity as the founder of defendant Bytehosting, is personally aware of, and has authorized, approved, ratified, participated in, and instigated the wrongful conduct set forth in this complaint.

18. Plaintiff is informed and believes and on that basis alleges that defendant Jain is personally aware of, and has authorized, approved, ratified,

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participated in, and instigated the wrongful conduct set forth in this complaint.

19. Plaintiff is informed and believes and on that basis alleges that defendant Sena is personally aware of, and has authorized, approved, ratified, participated in, and instigated the wrongful conduct set forth in this complaint.

20. Plaintiff is informed and believes and on that basis alleges that there exists, and at all times relevant hereto there existed, a unity of interest and ownership between defendants Reno, Jain, Sena and Bytehosting such that any individuality and separateness of Bytehosting ceased or never existed, and Bytehosting is the alter ego of Reno, Jain, and Sena.

21. Plaintiff is informed and believes and on that basis alleges that defendants Reno, Jain, and Sena created and continue to use Bytehosting to shield them from liability for the actions complained of in this complaint.

22. Plaintiff is informed and believes and on that basis alleges that Reno, Jain, and Sena have and continue to: commingle and fail to segregate Bytehosting's funds and other assets from their own; treat assets nominally belonging to Bytehosting as their own; and share a unity of ownership, control and management with Bytehosting.

23. Plaintiff is informed and believes and on that basis alleges that Bytehosting has inadequate capitalization and functions as a mere shell and/or conduit for the business ventures of Reno, Jain, and Sena such that any activities attributed to the former are in fact activities of the latter, and that Reno, Jain, and Sena use Bytehosting as a subterfuge designed to avoid liability for the wrongful conduct attributable to themselves as alleged throughout this complaint.

24. Adherence to the fiction of the existence of defendant Bytehosting as an entity separate and distinct from defendants Reno, Jain, and Sena would permit an abuse of the limited liability company privilege and would promote injustice and fraud in that it would enable defendants Reno, Jain, and Sena to continue to commit the actions complained of in this complaint while shielding themselves

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from liability by use of the insolvent Bytehosting.

CENTRAL ALLEGATIONS OF WRONGDOING

25. Plaintiff manufactures and distributes software for personal computers.

26. Plaintiff has produced several different versions of its Norton SystemWorks products, including: Norton SystemWorks 2002 (hereinafter NSW 2002), Norton SystemWorks 2002 Professional Edition (hereinafter NSW 2002 Pro), Norton SystemWorks 2003 (hereinafter NSW 2003), Norton SystemWorks 2003 Professional Edition (hereinafter NSW 2003 Pro), Norton SystemWorks 2004 (hereinafter NSW 2004), and Norton SystemWorks 2004 Professional Edition (hereinafter NSW 2004 Pro). The Norton SystemWorks Products are sometimes referred to collectively herein as "NSW." Each NSW product consists of a suite of several popular and useful software programs, including but not limited to the following:

- NSW 2002 includes Symantec's Norton AntiVirus 2002, Norton Utilities, Norton CleanSweep, Roxio's GoBack (which Symantec acquired from Roxio in 2003; before that time, Roxio owned the copyright and had granted Symantec rights to use, including in Symantec's NSW 2002, NSW 2002 Pro, NSW 2003 and NSW 2003 Pro).
- NSW 2002 Pro includes software included in NSW 2002, plus Symantec's Norton Ghost and revised and new full text material in the computer programs.
- NSW 2003 is an updated version of NSW 2002 and includes revised and new full text material in the computer programs.
- NSW 2003 Pro is an updated version of NSW 2002 Pro and includes revised and new full text material in the computer programs.

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- NSW 2004 is an updated version of NSW 2003 and includes revised and new full text material in the computer programs.
- NSW 2004 Pro is an updated version of NSW 2003 Pro and includes revised and new full text material in the computer programs.

27. Plaintiff also manufactures stand-alone versions of some of the software products bundled together in its NSW product. One popular product is Norton AntiVirus. Plaintiff has manufactured Norton AntiVirus 2003 and Norton AntiVirus 2003 Professional Edition for distribution and sale as separate products with their own disks and distinctive retail packaging.

28. For the 2004 product lines, Plaintiff added certain security features designed in part to make it more difficult for counterfeiters to sell, and for consumers to make use of, unauthorized copies of Plaintiff's software. These security features included enhanced procedures to prevent registration or use of counterfeit NSW and/or Norton AntiVirus software.

29. During 2002, Plaintiff became aware that the defendants were marketing and selling products using Plaintiff's trademarks, representing that such products were produced by Plaintiff, when in fact the defendants were marketing and selling products neither manufactured by nor authorized by Plaintiff, representing them as software manufactured by Plaintiff.

30. During 2002, Plaintiff began receiving complaints about defendants' advertising of purported Symantec and/or Norton brand products. The complaints included reports that the defendants were selling electronic downloadable copies as well as copies on Compact Discs ("CDs"). The complaints came from potential and/or existing customers of Plaintiff, hereinafter sometimes referred to as "Consumers."

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"Pop-Up" Advertising

31. Some Consumers notified Plaintiff that defendants were soliciting orders for purported Norton AntiVirus and Norton SystemWorks products via "pop-up" advertising as described below.

32. Some Consumers notified Plaintiff that a "pop-up" window had appeared on their computer, purportedly notifying them that their Symantec software was about to expire and needed to be renewed in order to continue functioning.

33. Plaintiff is informed and believes and on that basis alleges that those Consumers desired and intended to continue using Plaintiff's software for, among other things, purchasing (or acquiring) periodic updates to the virus-protection software built into NSW and Norton AntiVirus packages. Without those updates, those Consumers would not be protected by Plaintiff's NSW and/or Norton AntiVirus updates against new computer viruses and/or other forms of intrusion into their computer operating systems, memory and/or data stored in electronic form on their computers.

34. Plaintiff is informed and believes and on that basis alleges that some Consumers received such "pop-up" notifications very close to one year after they had purchased and/or registered Norton or Symantec software, and thus those Consumers believed the notifications were generated by Plaintiff's software or by Plaintiff.

35. Plaintiff is informed and believes and on that basis alleges that defendants caused such "pop-up" advertisements to appear on consumers' computer monitors. The "pop-up" advertisements sometimes advertise software represented to be manufactured or produced by Plaintiff.

36. Plaintiff is informed and believes and on that basis alleges that the "pop-up" advertisements are designed to cause Consumers to visit one or more internet web sites owned or controlled by defendants for the purpose of inducing

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the Consumers to purchase software represented to be manufactured or produced by Plaintiff and bearing unauthorized copies of Plaintiff's trademarks, logos, and copyrighted works, but which, in fact, has not been produced by Plaintiff and is counterfeit.

37. Plaintiff is informed and believes and on that basis alleges that the "pop-up" advertisements are designed to confuse Consumers and to cause them to visit one or more internet web sites owned or controlled by defendants for the purpose of inducing them to purchase software manufactured, marketed, distributed and/or sold by defendants. The advertisements use descriptions and depictions deceptively similar to Plaintiff's products, and the software delivered by the defendants is designed to be deceptively similar to software produced by Plaintiff.

38. Plaintiff is informed and believes and on that basis alleges that the "pop-up" advertisements are designed in a manner calculated to frighten Consumers by, among other things, falsely indicating that the Consumer's computer has been attacked by a computer virus or other harmful computer program and the Consumer's data stored on the computer is in danger of being, or is about to be, destroyed. Consumers complained to Plaintiff about these frightening advertisements, thinking they originated from Plaintiff.

Unauthorized Redirection or "Hijacking"

39. Consumers notified Plaintiff that their attempts to visit one of Plaintiff's web pages to order genuine updates or genuine products manufactured and/or produced by Plaintiff were intercepted and redirected to defendants' web pages.

40. Plaintiff is informed and believes and on that basis alleges that defendants intercept or redirect Consumers' attempts to access legitimate Symantec internet web sites and cause unsuspecting Consumers to end up at one or more of defendants' internet web sites. At those web sites, deceptively

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designed to give Consumers the impression they are accessing a legitimate Symantec web site, Consumers are induced to purchase the defendants' products, which defendants deceptively portray, design, and market to mislead Consumers into believing they are purchasing genuine Symantec products when, instead, defendants sell counterfeit, unauthorized Symantec products or their own products intentionally designed to look like Symantec products.

Unsolicited Commercial E-Mail ("Spam")

41. Plaintiff is informed and believes and on that basis alleges that defendants and/or defendants' agents sent unsolicited commercial e-mail advertisements ("spam") to thousands of unsuspecting Consumers, advertising software represented to be Norton and Symantec products at extremely low prices. These "spam" e-mails included links to defendants' internet web sites.

42. Plaintiff received numerous complaints from Consumers who had received "spam" from defendants and/or that linked to defendants' web sites.

43. Plaintiff is informed and believes and on that basis alleges that these "spam" e-mails were sent in a manner constituting violations of Calif. Bus. & Prof. Code §§ 17529-19529.9 and 17538.45, as well as violations of 15 U.S.C. §§ 7701 *et seq.*

Infringing and Unfair Internet Web Sites

44. Plaintiff is informed and believes and on that basis alleges that defendants advertise merchandise for sale, including software falsely represented to be produced by Plaintiff, on multiple internet web sites. In fact, the products offered for sale are counterfeit Symantec products or defendants' own products intentionally designed to look like Symantec products.

Deceptive Domain Names

45. Plaintiff is informed and believes and on that basis alleges that defendants have registered, caused to be registered, and/or use domain names similar to Plaintiff's trademarks, so that Consumers who misspell the name

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"Symantec" or "Norton" are directed or redirected to one of the defendants' internet web sites where defendants market counterfeit Symantec software and/or software deceptively similar to Plaintiff's software products, in order to induce Consumers to purchase from defendants instead of purchasing from Plaintiff.

46. Plaintiff is informed and believes and on that basis alleges that defendants have linked their internet web sites to domains named similar to Plaintiff's trademarks, so that Consumers who mistakenly access one of those sites are redirected to one of the defendants' internet web sites where defendants market counterfeit Symantec software and/or software deceptively similar to Plaintiff's software products, in order to induce Consumers to purchase from defendants instead of purchasing from Plaintiff.

Consumer Confusion

47. Plaintiff is informed and believes and on that basis alleges that defendants falsely represent their own products as genuine Norton or Symantec products via the aforementioned "pop-up" advertising, false notifications of expiration dates of Plaintiff's software, "spam" e-mails and advertisements on defendants' internet web sites, and market software deceptively similar to Plaintiff's software products, in order to deceive consumers into purchasing software manufactured, marketed, distributed and/or sold by defendants, believing it to be genuine Norton and/or Symantec products.

48. Plaintiff alleges on information and belief that Consumers who purchased such software believed it to be produced by Plaintiff, and were confused and misled by the defendants' deceptive methods of advertising and packaging and/or marketing, labeling, and sale of unauthorized software using Plaintiff's trademarks.

Purchases of Counterfeit Software From Defendants

49. In or about September 2003 Plaintiff, through its agents, purchased a copy of purported NSW 2003 Pro from defendants.

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50. The NSW 2003 Pro disk was delivered to Plaintiff's agents in Los Angeles County. The disk was shipped in a plain brown envelope in a white sleeve without any retail packaging, without any instruction manuals, and without any of the materials that would come with a genuine Symantec product.

51. Plaintiff inspected the disk and packaging materials and determined that the disk purchased from defendants was counterfeit, and was neither produced by Plaintiff nor authorized by Plaintiff to be produced by any other person or entity.

52. In or about October 2003 Plaintiff, through its agents, purchased a copy of purported Norton AntiVirus 2003 from defendants.

53. The Norton AntiVirus 2003 disk was shipped in a plain brown envelope in a white sleeve without any retail packaging, without any instruction manuals, and without any of the materials that would come with a genuine Symantec product.

54. Plaintiff inspected the disk and packaging materials and determined that the disk purchased from defendants was counterfeit, and was neither produced by Plaintiff nor authorized by Plaintiff to be produced by any other person or entity.

55. Plaintiff is informed and believes and on that basis alleges that at numerous other times defendants sold purported copies of Symantec products to Consumers who believed they were purchasing genuine Symantec products. Some of those Consumers contacted Plaintiff after becoming suspicious about the products delivered by defendants.

56. Several Consumers sent Plaintiff the disks and packaging materials they had purchased from defendants. Plaintiff inspected the disks and packaging materials and determined that the disks purchased from defendants were neither produced by Plaintiff nor authorized by Plaintiff to be produced by any other person or entity.

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57. Plaintiff is informed and believes and on that basis alleges that the NSW 2003 Pro disks were sold by defendants and delivered to Consumers in white sleeves without any retail packaging, without any instruction manuals, and without any of the materials that would come with a genuine Symantec product.

58. Defendants sell illegal counterfeit copies of Plaintiff's software. Defendants falsely represent to potential buyers that the software defendants sell is manufactured by Plaintiff. The software defendants deliver to purchasers bears the Symantec name and trademarks, but is neither produced by Plaintiff Symantec nor produced under Plaintiff Symantec's authorization or any Symantec license.

59. Plaintiff is informed and believes, and on that basis alleges, that defendants used unauthorized copies of Plaintiff's trademarks and/or copyrighted materials as part of the computer programs that caused the deceptive "pop-up" ads to appear on Consumers' computer monitors, and/or as part of the messages displayed on those "pop-up" ads, and/or in the internet web sites to which those Consumers were directed, and/or in the program language used to create the defendants' internet web site pages.

60. Plaintiff is informed and believes, and on that basis alleges, that defendants deliberately created their marketing scheme for the product called "WinAntiVirus," and deliberately designed the packaging and advertisements for WinAntiVirus, to deceive Consumers into purchasing WinAntiVirus thinking it was produced by Plaintiff, when in fact the WinAntiVirus product was not produced by Plaintiff but was produced by defendants and/or persons or entities unrelated to Plaintiff.

61. Plaintiff is informed and believes, and on that basis alleges, that defendants marketed, sold and delivered NSW, Norton AntiVirus, Norton Utilities, Norton CleanSweep, and other software with which the purchasers or recipients of such software themselves produced infringing copies of Plaintiff's copyrighted works by installing the counterfeit programs on their computers. As

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part of that installation process, each of those purchasers produces unauthorized copies of Plaintiff's copyrighted works with each such installation.

FIRST CLAIM FOR RELIEF

[Trademark Infringement

Lanham Act, 15 U.S.C. § 1051 - 1157]

(Against All Defendants)

62. Paragraphs 1 through 61 are incorporated by this reference as though set forth herein in full.

63. Plaintiff registered the name "Symantec" in the United States Patent and Trademark Office on April 21, 1992, registration number 1683688. Plaintiff owns the trademark, which continues to be in full force and effect.

64. Plaintiff registered the name "Norton SystemWorks" in the United States Patent and Trademark Office on September 11, 2001, registration number 2488092. Plaintiff owns the trademark, which continues to be in full force and effect.

65. Plaintiff registered the name "Norton AntiVirus" in the United States Patent and Trademark Office on March 16, 1993, registration number 1758084. Plaintiff owns the trademark, which continues to be in full force and effect.

66. The name "Ghost" was registered in the United States Patent and Trademark Office on November 28, 1978, registration number 1107115. Plaintiff owns the trademark, which continues to be in full force and effect.

67. Plaintiff registered the name "LiveUpdate" in the United States Patent and Trademark Office on May 4, 1999, registration number 2243057. Plaintiff owns the trademark, which continues to be in full force and effect.

68. The name "Norton Utilities" was registered in the United States Patent and Trademark Office on October 18, 1988, registration number 1508960. Plaintiff owns the trademark, which continues to be in full force and effect.

69. The name "pcAnywhere" was registered in the United States Patent

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and Trademark Office on July 13, 1993, registration number 1781148. Plaintiff owns the trademark, which continues to be in full force and effect.

70. From and after the date of registration of each of its trademarks, Plaintiff has used the trademarks continuously to identify its products, including NSW and other software. Plaintiff markets, distributes and sells software under the "Symantec," "Norton SystemWorks," "Norton AntiVirus" and other trademarks in California, throughout the United States, and in foreign countries.

71. Plaintiff is informed and believes and on that basis alleges that, at all times relevant to this complaint, defendants knew that the names "Symantec," "Norton SystemWorks" and "Norton AntiVirus" were registered trademarks, owned by Plaintiff. Plaintiff is informed and believes and on that basis alleges that, despite that knowledge, defendants intentionally continued to infringe Plaintiff's trademarks by advertising, marketing, selling and delivering software bearing Plaintiff Symantec's names and trademarks, designed to look like Plaintiff Symantec's software.

72. Plaintiff is informed and believes and on that basis alleges that defendants use Plaintiff's trademarks in interstate commerce by: (1) causing "spam" to be sent to Consumers, designed to mislead those Consumers into believing the "spam" originated from Symantec and/or that the "spam" advertises genuine Symantec products, when, in fact, the "spam" neither originates from Symantec nor advertises genuine Symantec products; (2) advertising defendants' products bearing the Plaintiff's trademarks on the internet; (3) using Plaintiff's trademarks in or in the programming of the "pop-up" advertisements defendants use to induce Consumers to purchase counterfeit and/or deceptively labeled products from defendants; and (4) shipping counterfeit copies of Plaintiff's software and deceptively labeled products in interstate commerce. Defendants' use of Plaintiff's trademarks on defendants' products is likely to cause confusion and has in fact misled and confused Consumers as to the source and quality of

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defendants' products. Defendants' marketing and sales using deceptive advertising and labeling are likely to cause confusion and have in fact misled and confused Consumers as to the source and quality of defendants' products.

73. Plaintiff is informed and believes and on that basis alleges that as a proximate result of the defendants' use of Plaintiff's trademark, defendants have taken unfair advantage of Plaintiff's research, development, advertising, marketing, and consumer recognition of the Symantec, NSW, Norton AntiVirus and other trademarks. Plaintiff is informed and believes and on that basis alleges that defendants have sold substantial amounts of software using Plaintiff's trademarks, and have thereby enjoyed substantial profits, in an amount as yet undetermined but as shall be proven at trial.

74. Plaintiff is informed and believes and on that basis alleges that unless restrained by this Court, defendants will continue to infringe Plaintiff's trademarks, thereby creating numerous claims against defendants and multiple proceedings, and that monetary compensation cannot provide Plaintiff with adequate relief for the damage caused by defendants to Plaintiff's trademarks, consumer recognition, and public confidence in Plaintiff's products.

75. Defendants' actions, if not restrained, will continue to cause irreparable harm to Plaintiff, for which Plaintiff has no adequate remedy at law. Defendants misrepresent their own products as those manufactured by Plaintiff. Plaintiff is informed and believes, and on that basis alleges, that Consumers who purchase defendants' products, believing they have purchased Plaintiff's software, will not purchase the genuine software from Plaintiff. Plaintiff has permanently lost such Consumers as customers, and has permanently lost the profits Plaintiff is entitled to under its trademarks.

76. Plaintiff is informed and believes and on that basis alleges that defendants' use of misleading, irritating and frightening "pop-up" advertisements, if not restrained, will continue to cause irreparable harm to Plaintiff inasmuch as

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numerous Consumers have already complained to Plaintiff about defendants' tactics, believing that Plaintiff is responsible for the "pop-up" advertisements.

77. Plaintiff is informed and believes and on that basis alleges that if defendants' products do not work properly, defendants' actions have further caused irreparable harm to Plaintiff's name and reputation, because defendants market and sell their products bearing false reproductions of Plaintiff's trademarks.

SECOND CLAIM FOR RELIEF

[False Designation of Origin]

[Lanham Act § 43(a); 15 U.S.C. § 1125(a) and (d)]

(Against All Defendants)

78. Paragraphs 1 through 77 are incorporated by this reference as though set forth herein in full.

79. Plaintiff has marketed, advertised and promoted its software under the names and logos "Symantec," "Norton SystemWorks," "Norton AntiVirus" and other names and logos. As a result of this marketing, advertising and promotion, Plaintiff's names and logos have come to mean and are understood to mean Plaintiff's products, and are the means by which Plaintiff's products are distinguished from other software in the United States and worldwide.

80. Because of Plaintiff's long, continuous and exclusive use of the names and logos as described in this complaint, Plaintiff's names and logos have acquired secondary meaning and are associated by both the software industry and the public with Plaintiff's products.

81. Defendants' activities in advertising and/or promoting their software (including, but not limited to, "pop-up" ads) bearing Plaintiff's names, logos and/or trademarks constitute false designation of origin, false description, and a false representation that defendants' software originates from or is sponsored, approved or authorized by Plaintiff. Thus, defendants' activities constitute

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violations of Section 43(a) of the Lanham Trademark Act, 15 U.S.C. § 1125(a).

82. Defendants' use of misspelled versions of Plaintiff's trademarks and names in domain names that defendants use to direct or redirect consumers to defendants' internet web sites constitutes false designation of origin, false description, and a false representation that defendants' software originates from or is sponsored, approved or authorized by Plaintiff. Thus, defendants' activities constitute violations of Section 43(a) of the Lanham Trademark Act, 15 U.S.C. § 1125(a) and (d).

83. As a result of the foregoing, Plaintiff has been damaged in an amount which has not been precisely ascertained, but which will be alleged by amendment at such time when it is precisely ascertained.

84. The activities of defendants have caused and will cause irreparable harm to Plaintiff for which Plaintiff has no adequate remedy at law in that (1) if defendants' wrongful conduct continues, consumers are likely to become further confused as to the ownership and/or affiliations of defendants' products; (2) the infringement by defendants constitutes an interference with Plaintiff's goodwill and customer relationships; and (3) defendants' wrongful conduct, and the damages resulting to Plaintiff, are continuing. Accordingly, Plaintiff is entitled to preliminary and permanent injunctive relief.

85. Defendants have committed the acts alleged above with previous knowledge of Plaintiff's prior use and superior rights to its names and logos, and with previous knowledge of the reputation of Plaintiff's products.

86. Further, defendants' actions were for the willful and calculated purpose of attracting customers to their products based upon the good will of Plaintiff's name and business reputation, so as to mislead and deceive purchasers and the public. Defendants' actions have caused and/or are likely to cause confusion and mistake among purchasers and the public as to the ownership or association of their products, all to defendants' gain and Plaintiff's damage.

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87. Plaintiff is also entitled to recovery of attorneys' fees and costs of suit pursuant to 15 U.S.C. § 1117.

THIRD CLAIM FOR RELIEF

[Copyright Infringement

17 U.S.C. § 501]

(Against All Defendants)

88. Paragraphs 1 through 87 are incorporated by this reference as though set forth herein in full.

89. Plaintiff designed, created, developed and owns or licenses software, including NSW, the other software included in the various versions of NSW, and Norton AntiVirus, which constitute the original work of Plaintiff.

90. Plaintiff complied with all laws governing copyright and secured the exclusive rights and privileges in and to the copyrights of NSW, Norton AntiVirus, Norton Utilities, Norton CleanSweep, Norton Ghost and other software.

91. Plaintiff has produced copies of the software in compliance with all copyright laws, whether by producing copies itself or under license to third parties.

92. Defendants infringed Plaintiff's copyrights on NSW, Norton AntiVirus, Norton Utilities, Norton CleanSweep, and other software by marketing, selling and delivering software largely, if not entirely, copied from Plaintiff's software.

93. Plaintiff is informed and believes and on that basis alleges that at all times relevant to this Complaint, defendants knew that Plaintiff owned both the trademark and the copyright for NSW and other software.

94. Despite that knowledge, defendants, and each of them, continue to advertise, market, sell and deliver counterfeit copies of Plaintiff's software, knowing that the discs they deliver are counterfeits and infringing on Plaintiff's

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copyrights. These actions have caused and continue to cause irreparable injury to Plaintiff by inducing Plaintiff's prospective customers to purchase software from defendants instead of from Plaintiff, and by misleading consumers as to the source of the software.

95. At least from and after 2002, defendants have been producing, marketing, selling and delivering counterfeit copies of Plaintiff's software, in violation and derogation of Plaintiff's copyrights on such software, thereby engaging in unfair trade practices and unfair competition against Plaintiff, causing irreparable damage to Plaintiff.

96. Plaintiff is informed and believes and on that basis alleges that as a proximate result of the defendants' marketing, selling and delivering counterfeit copies of Plaintiff's software, defendants have taken unfair advantage of Plaintiff's research, development, advertising, marketing, and consumer recognition of the copyrighted content of the software sold by Plaintiff. Plaintiff is informed and believes and on that basis alleges that defendants have sold numerous counterfeit copies of Plaintiff's software, and have thereby enjoyed substantial profits, in an amount as yet undetermined but as shall be proven at trial.

97. Defendants' actions, if not restrained, will continue to cause irreparable harm to Plaintiff, for which Plaintiff has no adequate remedy at law. Defendants misrepresent their own products as those manufactured by Plaintiff. Plaintiff is informed and believes, and on that basis alleges, that consumers who purchase defendants' products, believing they have purchased Plaintiff's software, will not purchase the genuine software from Plaintiff. Plaintiff has permanently lost such consumers as customers, and has permanently lost the profits Plaintiff is entitled to under its copyrights.

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FOURTH CLAIM FOR RELIEF

[Fraud]

(Against all Defendants)

98. Paragraphs 1 through 97 are incorporated by this reference as though set forth herein in full.

99. Plaintiff is informed and believes and on that basis alleges that defendants, in their marketing and advertising (including "spam" and "pop-ups" as alleged in this Complaint) and on their internet web sites, have deliberately misrepresented to consumers that the products sold are Symantec and/or Norton products, knowing that they are not.

100. Plaintiff is informed and believes and on that basis alleges that defendants intend that consumers will communicate those misrepresentations to plaintiff in order to obtain free customer service and free updates or upgrades that are available only to owners of genuine, authorized Symantec and/or Norton software products.

101. Plaintiff is informed and believes and on that basis alleges that defendants make those misrepresentations intending that plaintiff will act in reasonable reliance thereon, including but not limited to by providing free customer service and free updates or upgrades to purchasers of defendants' products that are available only to owners of genuine, authorized Symantec and/or Norton software products.

102. Plaintiff is informed and believes and on that basis alleges that plaintiff has justifiably relied on the misrepresentations of defendants in that plaintiff has provided free customer service and free updates or upgrades to some purchasers of defendants' products.

103. Plaintiff has suffered damages as a proximate result of the defendants' wrongful acts in an amount as yet undetermined, but in an amount that will be proven at trial.

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104. Defendants' conduct was and continues to be oppressive, fraudulent and malicious. Accordingly, Plaintiff is entitled to punitive damages in an amount to be proven at trial.

FIFTH CLAIM FOR RELIEF

[Unfair Competition

Calif. B&P Code § 17200, et seq.]

(Against all Defendants)

105. Paragraphs 1 through 104 are incorporated by this reference as though set forth herein in full.

106. Plaintiff is informed and believes and on that basis alleges that defendants have used "pop-up" advertisements, "spam," misspelled domain names confusingly and deceptively similar to Plaintiff's names and trademarks, and other unfair methods to direct consumers away from Plaintiff's internet web sites and to defendants' internet web sites. Defendants use these unfair methods to induce consumers to purchase products from defendants instead of from Plaintiff. The products defendants sell to consumers are counterfeit, unauthorized copies of Plaintiff's software and/or products deceptively similar to Plaintiff's products.

107. Plaintiff is informed and believes and on that basis alleges that defendants designed their marketing and advertising schemes for the purpose of confusing consumers and deceiving them into purchasing counterfeit and/or deceptively labeled products from defendants instead of genuine, authorized copies of Plaintiff's products.

108. The wrongful acts by defendants, as alleged throughout this complaint, constitute unlawful, unfair or fraudulent business acts and/or practices and unfair, deceptive, untrue or misleading statements and advertising in violation of California Business and Professions Code ("B&P") § 17200.

109. Plaintiff is informed and believes, and on that basis alleges, that

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defendants have developed lists of customers who have purchased counterfeit Symantec products, and use those lists to market additional products to those customers by, among other things, "pop-up" advertising. Plaintiff is informed and believes, and on that basis alleges, that defendants have further misled those customers into believing additional products offered for sale by defendants are Symantec products or upgrades to Symantec products, when in fact they are not.

110. As a result of irreparable injuries to Plaintiff caused by defendants' actions for which Plaintiff has no adequate remedy at law, defendants' acts constituting unfair competition should be enjoined, and the Court should make such orders or judgments as may be necessary to prevent the use of any practice which constitutes unfair competition under B&P § 17203.

111. Under B&P § 17203, and in addition to, or in lieu of, the damages Plaintiff has sustained to its business and reputation as a result of defendants' actions, Plaintiff seeks as damages restitution and/or disgorgement of the profits that defendants have made by virtue of their acts of unfair competition, in an amount as yet undetermined but as shall be proven at trial.

SIXTH CLAIM FOR RELIEF

[Common Law Unfair Competition]

(Against all Defendants)

112. Paragraphs 1 through 111 are incorporated by this reference as though set forth herein in full.

113. Defendants have pirated the fruits of Plaintiff's labor and are "palming off" those fruits as their own.

114. Due to defendants' acts of unfair competition, trade dress infringement, and deception, buyers of NSW and other software sold by defendants under the Symantec label have been deceived as to the source, approval and/or sponsorship of defendants' software, believing they are purchasing software manufactured by Plaintiff when in fact they are not.

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115. As a result of defendants' acts of unfair competition, Plaintiff has lost sales and profits in an amount as yet undetermined but in an amount that will be proven at trial.

116. Defendants' conduct was and continues to be oppressive, fraudulent and malicious. Accordingly, Plaintiff is entitled to punitive damages in an amount to be proven at trial.

SEVENTH CLAIM FOR RELIEF

[False Advertising

Calif. B&P Code §§ 17500, 17200]

(Against all Defendants)

117. Paragraphs 1 through 116 are incorporated by this reference as though set forth herein in full.

118. Plaintiff is informed and believes, and on that basis alleges, that defendants include pictures of Plaintiff's software and depictions of Plaintiff's trademarks and logos in their advertising materials sent to consumers as "spam," on the internet and elsewhere.

119. Plaintiff is informed and believes, and on that basis alleges, that defendants also use language and phrases copied from Plaintiff's advertising literature in their advertising materials, which were disseminated to the public.

120. Plaintiff is informed and believes and on that basis alleges that defendants disseminate their "pop-up" advertisements to the public. In those "pop-up" advertisements and/or in their internet web sites, defendants use Plaintiff's trademarks and logos, unauthorized copies of and/or depictions of Plaintiff's products, and/or language and phrases copied from Plaintiff's advertising literature.

121. The pictures, depictions, language and phrases constitute untrue or misleading statements and advertising in violation of B&P § 17500 in that they suggest the software for sale in the defendants' advertising is software

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manufactured by Plaintiff, when, in truth, what is being sold is defendants' inferior products.

122. The false and misleading statements and advertising also constitute practices that serve as a predicate for a B&P § 17200 violation, and Plaintiff separately alleges a violation of B&P § 17200.

123. As a result of defendants' actions, Plaintiff has been damaged in an amount as yet undetermined, but in an amount that will be proven at trial.

124. Defendants' conduct was and continues to be oppressive, fraudulent and malicious. Accordingly, Plaintiff is entitled to punitive damages in an amount to be proven at trial.

EIGHTH CLAIM FOR RELIEF

[Intentional Interference with Prospective Economic Advantage]

(Against all Defendants)

125. Paragraphs 1 through 124 are incorporated by this reference as though set forth herein in full.

126. This count arises under the unfair competition laws of the State of California.

127. Plaintiff has over the years developed a large base of customers and institutions who purchase Plaintiff's products. Plaintiff has also developed a substantial and valuable economic relationship with its products, software including but not limited to NSW.

128. Defendants contacted Plaintiff's actual and prospective customers with the intent to deprive Plaintiff of those customers' business. Those customers then purchased products from defendants rather than from Plaintiff. Defendants also interfered with Plaintiff's relationship with its products by marketing and distributing inferior and confusing counterfeit and/or knock-off versions.

129. As a proximate result of defendants' conduct, Plaintiff suffered damages in a sum in excess of $1,000,000.

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130. The acts of defendants were willful and malicious. Plaintiff is therefore entitled to punitive damages in an amount not less than $5,000,000. Unless restrained, defendants will continue to solicit Plaintiff's customers and money damages could not afford adequate relief.

NINTH CLAIM FOR RELIEF

[Negligent Interference with Prospective Economic Advantage]

(Against all Defendants)

131. Paragraphs 1 through 130 are incorporated by this reference as though set forth herein in full.

132. This count arises under the unfair competition laws of the State of California.

133. Plaintiff has over the years developed a large base of customers and institutions who purchase Plaintiff's products. Plaintiff has also developed a substantial and valuable economic relationship with its products, software including but not limited to NSW.

134. Defendants have a duty to use due care to refrain from wrongful actions that would interfere with Plaintiff's prospective economically advantageous relationships with Plaintiff's existing customers, potential customers, and products.

135. Defendants breached their duties by soliciting Plaintiff's existing and/or potential customers for the purpose of selling to them products bearing Plaintiff's trademarks but which defendant knew or should have known were counterfeit. Those customers then purchased counterfeit products from defendants rather than genuine Symantec products from Plaintiff. Defendants also interfered with Plaintiff's relationship with its products by marketing confusing knock-off versions when defendants should have known those versions were counterfeit.

136. As a proximate result of defendants' conduct, Plaintiff suffered damages in a sum in excess of $1,000,000.

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PRAYER

WHEREFORE, Plaintiff prays for judgment as follows:

I. On the First Claim for Relief for Trademark Infringement (Lanham Act, 15 U.S.C. § 1051 - 1157):

A. That defendants, their officers, agents, and servants, and all persons acting in concert with them, be temporarily restrained, preliminarily enjoined during the pendency of this action, and permanently enjoined thereafter from engaging in further acts of:

1. using photos of Plaintiff's products or depictions of Plaintiff's products or logos in defendants' advertising;
2. advertising, selling, licensing, or otherwise marketing or distributing defendants' pirated copies of Plaintiff's software, or any product configuration similar to Plaintiff's products;
3. using language and phrases contained in Plaintiff's advertising literature in defendants' advertising;
4. causing any "pop-up" advertisement or warning to appear on any computer that does any of the acts prohibited in A.1, A.2, or A.3 above;
5. contacting, soliciting, directing advertisements to, or in any other manner using any information about any consumer to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products; and
6. using any internet domain name that is deceptively similar to any of Plaintiff's trademarks.

B. That defendants be required to turn over to Plaintiff any products advertised or packaged to appear similar to genuine Norton and/or Symantec products, together with the names, addresses, telephone

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numbers, e-mail addresses and other information concerning any and all consumers to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products.

C. That defendants pay to Plaintiff the damages Plaintiff has sustained as a consequence of their conduct.

D. That defendants be required to account for and pay over to Plaintiff all the profits which they have derived from their wrongful activities and to pay such damages to Plaintiff as to this Court shall appear just and proper.

E. That defendants pay to Plaintiff punitive and/or treble damages for their intentional and willful wrongful acts.

F. That Plaintiff recover its costs and reasonable attorneys' fees.

G. That defendants transfer to Plaintiff ownership and control of each internet domain name owned or controlled by any of the defendants, their officers, agents, and/or any persons acting in concert with them, that is deceptively similar to any of Plaintiff's trademarks.

H. That Plaintiff have such other and further relief as to this Court shall appear just and proper.

II. On the Second Claim for Relief for False Designation of Origin — Lanham Act § 43(a):

A. That defendants, their officers, agents, and servants, and all persons acting in concert with them, be temporarily restrained, preliminarily enjoined during the pendency of this action, and permanently enjoined thereafter from engaging in further acts of:

1. using photos of Plaintiff's products or depictions of Plaintiff's products or logos in defendants' advertising;

2. advertising, selling, licensing, or otherwise marketing or

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distributing defendants' pirated copies of Plaintiff's software, or any product configuration similar to Plaintiff's products;

3. using language and phrases contained in Plaintiff's advertising literature in defendants' advertising;

4. causing any "pop-up" advertisement or warning to appear on any computer that does any of the acts prohibited in A.1, A.2, or A.3 above;

5. contacting, soliciting, directing advertisements to, or in any other manner using any information about any consumer to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products; and

6. using any internet domain name that is deceptively similar to any of Plaintiff's trademarks.

B. That defendants be required to turn over to Plaintiff any products advertised or packaged to appear similar to genuine Norton and/or Symantec products, together with the names, addresses, telephone numbers, e-mail addresses and other information concerning any and all consumers to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products.

C. That defendants pay to Plaintiff the damages Plaintiff has sustained as a consequence of their conduct.

D. That defendants be required to account for and pay over to Plaintiff all the profits which they have derived from their wrongful activities and to pay such damages to Plaintiff as to this Court shall appear just and proper.

E. That defendants pay to Plaintiff punitive and/or treble damages for

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their intentional and willful wrongful acts.

F. That Plaintiff recover its costs and reasonable attorneys' fees.

G. That defendants transfer to Plaintiff ownership and control of each internet domain name owned or controlled by any of the defendants, their officers, agents, and/or any persons acting in concert with them, that is deceptively similar to any of Plaintiff's trademarks.

H. That Plaintiff have such other and further relief as to this Court shall appear just and proper.

III. On the Third Claim for Relief for Copyright Infringement:

A. That defendants, their officers, agents, and servants, and all persons acting in concert with them, be temporarily restrained, preliminarily enjoined during the pendency of this action, and permanently enjoined thereafter from engaging in further acts of:

1. using photos of Plaintiff's products or depictions of Plaintiff's products or logos in defendants' advertising;

2. advertising, selling, licensing, or otherwise marketing or distributing defendants' pirated copies of Plaintiff's software, or any product configuration similar to Plaintiff's products;

3. using language and phrases contained in Plaintiff's advertising literature in defendants' advertising;

4. causing any "pop-up" advertisement or warning to appear on any computer that does any of the acts prohibited in A.1, A.2, or A.3 above; and

5. contacting, soliciting, directing advertisements to, or in any other manner using any information about any consumer to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products.

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B. That defendants be required to turn over to Plaintiff any products advertised or packaged to appear similar to genuine Norton and/or Symantec products, together with the names, addresses, telephone numbers, e-mail addresses and other information concerning any and all consumers to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products.

C. That defendants pay to Plaintiff the damages Plaintiff has sustained as a consequence of their conduct.

D. That defendants be required to account for and pay over to Plaintiff all the profits which they have derived from their wrongful activities and to pay such damages to Plaintiff as to this Court shall appear just and proper.

E. That, upon election by Plaintiff, defendants be required to pay the maximum allowable amount of statutory damages for their wrongful acts.

F. That Plaintiff recover its costs and reasonable attorneys' fees.

G. That Plaintiff have such other and further relief as to this Court shall appear just and proper.

IV. On the Fourth Claim for Relief for Fraud:

A. That defendants, their officers, agents, and servants, and all persons acting in concert with them, be temporarily restrained, preliminarily enjoined during the pendency of this action, and permanently enjoined thereafter from engaging in further acts of:

1. using photos of Plaintiff's products or depictions of Plaintiff's products or logos in defendants' advertising;

2. advertising, selling, licensing, or otherwise marketing or distributing defendants' pirated copies of Plaintiff's software,

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or any product configuration similar to Plaintiff's products;

3. using language and phrases contained in Plaintiff's advertising literature in defendants' advertising;

4. causing any "pop-up" advertisement or warning to appear on any computer that does any of the acts prohibited in A.1, A.2, or A.3 above;

5. contacting, soliciting, directing advertisements to, or in any other manner using any information about any consumer to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products; and

6. using any internet domain name that is deceptively similar to any of Plaintiff's trademarks.

B. That defendants be required to turn over to Plaintiff any products advertised or packaged to appear similar to genuine Norton and/or Symantec products, together with the names, addresses, telephone numbers, e-mail addresses and other information concerning any and all consumers to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products.

C. That defendants pay to Plaintiff the damages Plaintiff has sustained as a consequence of their conduct.

D. That defendants be required to account for and pay over to Plaintiff all the profits which they have derived from their wrongful activities and to pay such damages to Plaintiff as to this Court shall appear just and proper.

E. That defendants pay to Plaintiff punitive damages for their intentional and willful wrongful acts.

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F. That Plaintiff recover its costs and reasonable attorneys' fees.

G. That defendants transfer to Plaintiff ownership and control of each internet domain name owned or controlled by any of the defendants, their officers, agents, and/or any persons acting in concert with them, that is deceptively similar to any of Plaintiff's trademarks.

H. That Plaintiff have such other and further relief as to this Court shall appear just and proper.

V. On the Fifth Claim for Relief for Unfair Competition (Calif. B&P Code § 17200, *et seq.*):

A. That defendants, their officers, agents, and servants, and all persons acting in concert with them, be temporarily restrained, preliminarily enjoined during the pendency of this action, and permanently enjoined thereafter from engaging in further acts of:

1. using photos of Plaintiff's products or depictions of Plaintiff's products or logos in defendants' advertising;
2. advertising, selling, licensing, or otherwise marketing or distributing defendants' pirated copies of Plaintiff's software, or any product configuration similar to Plaintiff's products;
3. using language and phrases contained in Plaintiff's advertising literature in defendants' advertising;
4. causing any "pop-up" advertisement or warning to appear on any computer that does any of the acts prohibited in A.1, A.2, or A.3 above;
5. contacting, soliciting, directing advertisements to, or in any other manner using any information about any consumer to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products; and

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6. using any internet domain name that is deceptively similar to any of Plaintiff's trademarks.

B. That defendants be required to turn over to Plaintiff any products advertised or packaged to appear similar to genuine Norton and/or Symantec products, together with the names, addresses, telephone numbers, e-mail addresses and other information concerning any and all consumers to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products.

C. That defendants be required to account for and pay over to Plaintiff all the profits which they have derived from their wrongful activities and to pay such damages to Plaintiff as to this Court shall appear just and proper.

D. That Plaintiff recover its costs and reasonable attorneys' fees.

E. That defendants transfer to Plaintiff ownership and control of each internet domain name owned or controlled by any of the defendants, their officers, agents, and/or any persons acting in concert with them, that is deceptively similar to any of Plaintiff's trademarks.

F. That Plaintiff have such other and further relief as to this Court shall appear just and proper.

VI. On the Sixth Claim for Relief for Common Law Unfair Competition:

A. That defendants, their officers, agents, and servants, and all persons acting in concert with them, be temporarily restrained, preliminarily enjoined during the pendency of this action, and permanently enjoined thereafter from engaging in further acts of:

1. using photos of Plaintiff's products or depictions of Plaintiff's products or logos in defendants' advertising;

2. advertising, selling, licensing, or otherwise marketing or

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distributing defendants' pirated copies of Plaintiff's software, or any product configuration similar to Plaintiff's products;

3. using language and phrases contained in Plaintiff's advertising literature in defendants' advertising;

4. causing any "pop-up" advertisement or warning to appear on any computer that does any of the acts prohibited in A.1, A.2, or A.3 above;

5. contacting, soliciting, directing advertisements to, or in any other manner using any information about any consumer to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products; and

6. using any internet domain name that is deceptively similar to any of Plaintiff's trademarks.

B. That defendants be required to turn over to Plaintiff any products advertised or packaged to appear similar to genuine Norton and/or Symantec products, together with the names, addresses, telephone numbers, e-mail addresses and other information concerning any and all consumers to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products.

C. That defendants pay to Plaintiff the damages Plaintiff has sustained as a consequence of their conduct.

D. That defendants be required to account for and pay over to Plaintiff all the profits which they have derived from their wrongful activities and to pay such damages to Plaintiff as to this Court shall appear just and proper.

E. That defendants pay to Plaintiff punitive damages for their intentional

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and willful wrongful acts.

F. That Plaintiff recover its costs and reasonable attorneys' fees.

G. That defendants transfer to Plaintiff ownership and control of each internet domain name owned or controlled by any of the defendants, their officers, agents, and/or any persons acting in concert with them, that is deceptively similar to any of Plaintiff's trademarks.

H. That Plaintiff have such other and further relief as to this Court shall appear just and proper.

VII. On the Seventh Claim for Relief for False Advertising (Calif. B&P Code §§ 17500, 17200):

A. That defendants, their officers, agents, and servants, and all persons acting in concert with them, be temporarily restrained, preliminarily enjoined during the pendency of this action, and permanently enjoined thereafter from engaging in further acts of:

1. using photos of Plaintiff's products or depictions of Plaintiff's products or logos in defendants' advertising;

2. advertising, selling, licensing, or otherwise marketing or distributing defendants' pirated copies of Plaintiff's software, or any product configuration similar to Plaintiff's products;

3. using language and phrases contained in Plaintiff's advertising literature in defendants' advertising;

4. causing any "pop-up" advertisement or warning to appear on any computer that does any of the acts prohibited in A.1, A.2, or A.3 above;

5. contacting, soliciting, directing advertisements to, or in any other manner using any information about any consumer to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or

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counterfeit Norton and/or Symantec products; and

6. using any internet domain name that is deceptively similar to any of Plaintiff's trademarks.

B. That defendants be required to turn over to Plaintiff any products advertised or packaged to appear similar to genuine Norton and/or Symantec products, together with the names, addresses, telephone numbers, e-mail addresses and other information concerning any and all consumers to whom defendants have sold, distributed, delivered and/or directed advertising for Norton and/or Symantec products or counterfeit Norton and/or Symantec products.

C. That defendants be required to account for and pay over to Plaintiff all the profits which they have derived from their wrongful activities and to pay such damages to Plaintiff as to this Court shall appear just and proper.

D. That Plaintiff recover its costs and reasonable attorneys' fees.

E. That defendants transfer to Plaintiff ownership and control of each internet domain name owned or controlled by any of the defendants, their officers, agents, and/or any persons acting in concert with them, that is deceptively similar to any of Plaintiff's trademarks.

F. That Plaintiff have such other and further relief as to this Court shall appear just and proper.

VIII. On the Eighth Claim for Relief for Intentional Interference with Prospective Economic Advantage:

A. That defendants pay to Plaintiff the damages Plaintiff has sustained as a consequence of their conduct.

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B. That defendants be required to account for and pay over to Plaintiff all the profits which they have derived from their wrongful activities and to pay such damages to Plaintiff as to this Court shall appear just and proper.

C. That defendants pay to Plaintiff punitive damages for their intentional and willful wrongful acts.

D. That Plaintiff recover its costs and reasonable attorneys' fees.

E. That defendants transfer to Plaintiff ownership and control of each internet domain name owned or controlled by any of the defendants, their officers, agents, and/or any persons acting in concert with them, that is deceptively similar to any of Plaintiff's trademarks.

F. That Plaintiff have such other and further relief as to this Court shall appear just and proper.

IX. On the Ninth Claim for Relief for Negligent Interference with Prospective Economic Advantage:

A. That defendants pay to Plaintiff the damages Plaintiff has sustained as a consequence of their conduct.

B. That defendants be required to account for and pay over to Plaintiff all the profits which they have derived from their wrongful activities and to pay such damages to Plaintiff as to this Court shall appear just and proper.

C. That Plaintiff recover its costs and reasonable attorneys' fees.

D. That defendants transfer to Plaintiff ownership and control of each internet domain name owned or controlled by any of the defendants, their officers, agents, and/or any persons acting in concert with them, that is deceptively similar to any of Plaintiff's trademarks.

E. That Plaintiff have such other and further relief as to this Court shall appear just and proper.

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DEMAND FOR JURY TRIAL

The Plaintiff hereby demands a trial by jury in this action.

Dated: April 29, 2004

BAUTE & TIDUS LLP

By: _____
Jeffrey A. Tidus
Attorneys for Plaintiff
SYMANTEC CORPORATION

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P. SEND

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

SCANNED

Case No. CV 04-3017 PA (Mcx) Date March 28, 2005

Title Symantec Corp. v. James Reno, et al.

Present: The Honorable PERCY ANDERSON, UNITED STATES DISTRICT JUDGE

C. Kevin Reddick	Jennifer Cheshire	N/A
Deputy Clerk	Court Reporter	Tape No.

Attorneys Present for Plaintiffs:	Attorneys Present for Defendants:
Patrick Maloney	Kenneth Perkins Brian Dobbs

Proceedings: EX PARTE Application for Relief from Default

Before the Court is defendant Sam Jain's ("Jain") Ex Parte Application for Relief from Default (Docket No. 89). Plaintiff Symantec Corporation's ("Symantec") Complaint alleges that Jain and others sold counterfeit copies of Symantec's software through several internet retailers controlled by defendants. Symantec purchased copies of the software and determined them to be counterfeit. Symantec filed suit alleging claims for trademark and copyright infringement and state law causes of action for unfair competition, false advertising, and interference with prospective economic advantage. All defendants except Jain either settled with Symantec or have been dismissed.

Symantec had a difficult time finding Jain and serving him with the Complaint. In August 2004, Symantec sought additional time to serve Jain and to serve him by alternate methods. In support of its motion for additional time, Symantec submitted responses to discovery it had conducted to determine Jain's whereabouts. In deposing James Reno, Jain's co-defendant, Symantec discovered that Jain had referred Reno to Kenneth Perkins, Jain's lawyer on other matters, and that Jain was paying Perkins to defend Reno in this action. Symantec also learned that Reno sent a copy of the summons and complaint to Jain and that Reno, Jain, and Perkins had a conference call in which Jain and Reno discussed Symantec's claims against them with Perkins. Symantec also deposed Jain's father in August 2004. Jain's father testified that he had discussed Symantec's lawsuit with his son. Symantec's discovery efforts also identified certain e-mail addresses and a facsimile number that Reno and Perkins had used to contact Jain. The e-mail addresses and facsimile number were active just weeks before Symantec sought permission, through its noticed motion, to serve Jain at the e-mail addresses and facsimile number it had identified.

DOCKETED ON CM
MAR 30 2005
BY

The Court granted Symantec's motion for an extension of time to serve Jain and authorized service by publication in Los Angeles and Honolulu, where Jain had last lived, through the e-mail addresses and facsimile number Symantec had identified, and by serving Perkins. The Court concluded that these methods were reasonably calculated under the circumstances to provide Jain with notice of the

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SEND

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No. CV 04-3017 PA (Mcx) Date March 28, 2005

Title Symantec Corp. v. James Reno, et al.

SCANNED

pendency of the action and an opportunity to present his objections. See Rio Properties, Inc. v. Rio International Interlink, 284 F.3d 1007, 1016-17 (9th Cir. 2002). Symantec served Jain as authorized by the Court as of October 4, 2004, but the e-mail addresses and facsimile number Symantec had identified had been shutdown in the weeks between the filing of Symantec's motion and the hearing date. Jain still did not respond to the Complaint and the Court, on November 29, 2004, directed that Symantec seek Jain's default by December 9, 2004. Symantec filed a request for entry of Jain's default on December 6, 2004, and the clerk entered Jain's default on December 9, 2004.

On January 4, 2005, the Court ordered Symantec to file a motion for default judgment or other dispositive motion against Jain by January 14, 2005. Symantec filed a motion for default judgment with a February 28, 2005 hearing date. Jain filed no opposition to the motion for default judgment. On February 23, 2005, the Court continued the hearing date to March 21, 2005 and ordered Symantec to supplement its evidence on damages. Unbeknownst to the Court, Jain had retained Perkins in January to represent him in this matter. Perkins contacted Symantec in January seeking Symantec's agreement on a stipulation vacating Jain's default. Symantec rejected the stipulation. Jain did not seek relief from the default or in any other way appear in the action or oppose the default until March 18, 2005 when he filed this ex parte application.

In support of his ex parte application, Jain has submitted a declaration in which he states that he "failed to seek legal representation in this matter or to timely respond to Plaintiff's complaint because I mistakenly believed that I had not been properly served with the summons and complaint." Jain asserts that he has "a just and complete defense" to Symantec's claims and seeks to file a cross-claim for indemnity against those from whom he claims to have purchased the allegedly counterfeit Symantec software. Symantec has filed an opposition to Jain's ex parte application and requests that the Court instead grant Symantec's pending motion for default judgment.

Federal Rule of Civil Procedure 55(c) provides that a court may set aside the entry of a default "[f]or good cause shown." "The 'good cause' standard that governs vacating an entry of default under Rule 55(c) is the same standard that governs vacating a default judgment under Rule 60(b)." Franchise Holding II, LLC v. Huntington Restaurants Group, Inc., 375 F.3d 922, 925 (9th Cir. 2004). As a result, in determining whether to vacate the entry of a default or a default judgment, the district court should consider "whether the defendant's culpable conduct led to the default; whether the defendant has a meritorious defense; and whether reopening the default . . . would prejudice the plaintiff." TCI Group Life Ins. Plan v. Knoebber, 244 F.3d 691, 696 (9th Cir. 2001). "This tripartite test is disjunctive. Hence, the trial court's denial of a motion to vacate a default judgment will be affirmed if the defendant's own culpable conduct prompted the default." In re Hammer, 940 F.2d 524, 526 (9th Cir. 1991) (citations omitted). The party seeking to vacate a default judgment bears the burden of demonstrating that the factors favor vacating the default. TCI Group Life Ins. Plan, 244 F.3d at 696.

Although motions for relief from entry of default under Rule 55(c) apply the same "good cause"

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standard as motions to vacate default judgments, the Ninth Circuit "recognize[s] that the standards for setting aside entry of default under Rule 55(c) are less rigorous than those for setting aside a default." Hawaii Carpenters' Trust Funds v. Stone, 794 F.2d 508, 513 (9th Cir. 1986). Because judgments on the merits are favored, "appropriate exercise of district court discretion . . . requires that the finality interest should give way fairly readily to further the competing interest in reaching the merits of a dispute." TCI Group Life Ins. Plan, 244 F.3d at 696.

Here, there is no question that Jain received actual notice of the Complaint months before his default was entered. "A party's conduct is culpable if he has received actual or constructive notice of the filing of the action and failed to answer the complaint." In re Hammer, 940 F.2d at 526; TCI Group Life Ins. Plan, 244 F.3d at 698 ("[W]e have typically held that a defendant's conduct was culpable . . . where there is no explanation of the default inconsistent with a devious, deliberate, willful, or bad faith failure to respond."). Jain's declaration does not claim ignorance of the action. Instead, Jain states that he "did not think it was necessary" to file an answer because he "mistakenly believed that [he] had not been properly served with the summons and complaint." Having been sued previously, Jain is no stranger to litigation. Moreover, Jain discussed the matter with Perkins, his attorney on other matters, and was paying Perkins to defend Reno in this action. As the Ninth Circuit has explained, such circumstances indicate culpability:

> [W]e have tended to consider the defaulting party's general familiarity with legal processes or consultation with lawyers at the time of the default as pertinent to the determination whether the party's conduct in failing to respond to legal process was deliberate, willful or in bad faith. Absent some explanation . . . it is fair to expect that individuals who have previously been involved in litigation or have consulted with a lawyer appreciate the consequences of failing to answer and do so only if they see some advantage to themselves.

TCI Group Life Ins. Plan, 244 F.3d at 699.

All of the information available to the Court supports the conclusion that Jain alone is responsible for the entry of the default against him. He had actual notice of this action from the very beginning. He discussed the matter with his attorney long before his default was entered, arranged for Perkins to defend Reno, and paid Perkins' attorney's fees. Jain appears to have attempted to evade service by, among other things, not even informing his parents of his address. Additionally, the timing of the discontinuation of the e-mail addresses and the facsimile number which were working just weeks before Symantec sought permission to serve him by e-mail and facsimile is, to say the least, highly suspicious. Jain has therefore failed to satisfy his burden to establish that the entry of the default against him did not result from his culpable conduct.

The other two factors weigh at least slightly in favor of relieving Jain from the entry of the

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default. By disclaiming actual knowledge that the software he sold was counterfeit, Jain may have a meritorious defense to at least a portion of the damages Symantec seeks for willful infringement. But see Franchise Holding II, 375 F.3d at 926 ("To justify vacating the default judgment, however, [defendant] had to present specific facts that would constitute a defense. [Defendant] never did this. Instead, it offered the district court only conclusory statements that a dispute existed. A 'mere general denial without facts to support it' is not enough to justify vacating a default or default judgment.") (quoting Madsen v. Bumb, 419 F.2d 4, 6 (9th Cir. 1969)).[1/] With respect to prejudice, Symantec has not shown that it will suffer "greater harm than simply delaying resolution of the case." TCI Group Life Ins. Plan, 244 F.3d at 701.

The Court finds that Jain's failure to timely respond to the Complaint is solely the result of his culpable conduct. Jain should not be rewarded for his cynical and intentional manipulation of these proceedings. The Court therefore denies Jain's ex parte application for relief from entry of default. The Court shall address the merits of Symantec's motion for default judgment in a separate order.

IT IS SO ORDERED.

[1/] The Court notes that Jain is free to pursue his proposed cross-claim for indemnity in a separate action.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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Initials of Preparer _____

California Business Portal

Secretary of State DEBRA BOWEN

DISCLAIMER: The information displayed here is current as of SEP 05, 2008 and is updated weekly. It is not a complete or certified record of the Corporation.

Corporation		
EFRONT MEDIA, INC.		
Number: C2234885	**Date Filed:** 5/9/2000	**Status:** forfeited
Jurisdiction: DELAWARE		
Address		
650 TOWN CENTER DRIVE 7TH FLOOR		
COSTA MESA, CA 92626		
Agent for Service of Process		
SAM JAIN		
650 TOWN CENTER DRIVE 12TH FLOOR		
COSTA MESA, CA 92626		

Blank fields indicate the information is not contained in the computer file.

If the status of the corporation is "Surrender", the agent for service of process is automatically revoked. Please refer to California Corporations Code Section 2114 for information relating to service upon corporations that have surrendered.

Vendorid	Company Name	Address 1	Address 2	City	State	ZIP	Country	URL	Last Name	First Name	Phone	Email	Creation Date	Total Charge	Total Impressions
85658	Globedat	2800 Western Avenue		Seattle	WA	98121	USA	http://www.winantivirus.com	R	K	2067302606	marketing1@globedat.com	Oct 1 2004 8:21PM	$62,020.45	4480760
86553	Globedat	1516 Running Oak Lane		Royal Palm Beach	FL	33411	USA	air.amxtravel.com	Cohen	Marc	561-289-8599	marketing1@globedat.com	Dec 3 2004 6:12PM	$2,000.49	135092
87011	Globedat	2800 western avenue		seattle	WA	98121	USA	98121	R	K	2067302606	marketing1@globedat.com	Jan 3 2005 10:26PM	$64,629.70	4009657
87056	Globedat	2800 western avenue		seattle	WA	98121	USA	http://www.winantivirupro.com/?aid=mgwavp1	R	Kristy	2067302606	marketing1@globedat.com	Jan 6 2005 10:50PM	$401,276.59	70739071
87129	Globedat	2800 western avenue		seattle	WA	98121	USA	globedat	R	K	2067302606	marketing1@globedat.com	Jan 11 2005 10:31PM	$46,756.16	8452453
87712	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		D	M	2067302606	marketing1@globedat.com	Mar 2 2005 1:39PM	$168,317.09	33195465
88639	Globedat	2800 western avenue		seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Apr 21 2005 9:22PM	$9,656.59	1654153
88726	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Apr 27 2005 8:07AM	$1,250.13	217405
89573	Globedat	2800 western avenue		seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Jun 12 2005 12:32PM	$702,181.60	121831808
89923	Jobdrill	22 Camegie Cres		Thornhill	OT	l3t5h1	USA		Dsouza	M	206 730 2606	marketing3@globedat.com	Jul 7 2005 1:44AM	$129.22	14573
90012	Winfixer	2800 western avenue		seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 15 2005 12:58PM	$394,571.72	72311006
90396	Globedat	2800 western avenue		seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 29 2005 2:01PM	$487.08	130013
90448	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Aug 3 2005 3:00PM	$317,707.39	87816562
90729	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Aug 24 2005 4:12PM	$9,000.21	1764747
90979	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Sep 15 2005 1:16PM	$210.84	60239
90980	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Sep 15 2005 1:25PM	$208.00	59429
90981	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Sep 15 2005 1:30PM	$200.92	39397
90982	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Sep 15 2005 1:39PM	$200.85	30923
500140	Globedat	2800 Western avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Oct 6 2005 12:47PM	$244,949.52	48724995
511143	Globedat	2800 Western Avenue	NULL	Seattle	WA	98121	USA	NULL	Ross	Kristy	206 730 2606	marketing1@globedat.com	Nov 16 2004 5:00PM	$2,250.53	32068
516308	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Jan 30 2006 9:34AM	$500.60	7365
553204	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Apr 10 2006 4:29PM	$513.91	138894
553971	Drivecleaner	2800 western avenue		seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	May 10 2006 6:33AM	$7,242.35	1359305
554435	Globedat	2800 Western Ave		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	May 25 2006 12:02PM	$229.19	45838
554472	Globedat	2800 Western Avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	May 26 2006 10:27AM	$28,970.54	5794394
554990	Freerepair	2800 western avenue		Seattle	WA	98121	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Jun 13 2006 12:55PM	$4,256.86	851393
554992	Antivirus	PO Box 54838		Manama		54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jun 13 2006 1:16PM	$1,768.63	353744
554994	globedat	po box 54838		manama		54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jun 13 2006 1:31PM	$2,295.39	458768
554995	globedat	po box 54838		manama		54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jun 13 2006 1:46PM	$3,236.92	647414
555192	globedat	po box 54838		manama		54838	BHR		D	M	2067302606	marketing2@globedat.com	Jun 21 2006 2:46PM	$604,569.97	120914645
555466	antivirus	PO Box 54838		Manama		54838	BHR		D	M	2067302606	marketing2@globedat.com	Jul 5 2006 1:11PM	$98,765.13	19296741
555630	globedat	po box 54838		manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 12 2006 4:34PM	$2,109.02	1406015
555632	globedat	po box 54838		manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 12 2006 4:37PM	$9,211.40	4605701
555633	globedat	po box 54838		manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 12 2006 4:40PM	$3,147.47	899276
555634	globedat	po box 54838		manama	OT	54838	USA		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 12 2006 4:45PM	$2,460.24	492048
555635	globedat	po box 54838		manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 12 2006 4:47PM	$46,173.90	20988407
555636	globedat	po box 54838		manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 12 2006 4:52PM	$81,869.70	38990356
555660	globedat	po box 54838		manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 13 2006 3:58PM	$4,621.76	1155518
555662	globedat	po box 54838		manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 13 2006 4:00PM	$2,673.62	681578
555664	globedat	po box 54838		manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 13 2006 4:03PM	$5,407.12	1802374
555665	globedat	po box 54838		manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Jul 13 2006 4:05PM	$1,801.05	360209
557556	FreePCSecure	PO Box 54838		Manama		54838	BHR		D	M	2067302606	marketing1@globedat.com	Oct 2 2006 7:52AM	$73.93	15367

MGC000056

558332	Globedat	po box 54838		Manama	OT	54838	BHR	fr.drivecleaner.com	Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:31PM		$304.70		30470
558333	Globedat	po box 54838		Manama	OT	54838	BHR	se.drivecleaner.com	Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:33PM		$380.55		38055
558334	Globedat	po box 54838		Manama	OT	54838	BHR	nl.drivecleaner.com	Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:34PM		$300.89		30089
558335	Globedat	po box 54838		Manama	OT	54838	BHR	de.drivecleaner.com	Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:35PM		$306.35		30635
558336	Globedat	po box 54838		Manama	OT	54838	BHR	dk.drivecleaner.com	Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:37PM		$247.59		24759
558337	Globedat	po box 54838		Manama	OT	54838	BHR	es.drivecleaner.com	Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:38PM		$406.23		40623
558338	Globedat	po box 54838		Manama	OT	54838	BHR	no.drivecleaner.com	Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:40PM		$184.12		18412
558339	Globedat	po box 54838		Manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:41PM		$501.05		238596
558340	Globedat	po box 54838		Manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:43PM		$367.02		86500
558342	Globedat	po box 54838		Manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:44PM		$1,283.58		256716
558343	Globedat	po box 54838		Manama	OT	54838	BHR		Ross	Kristy	2067302606	marketing1@globedat.com	Nov 17 2006 2:45PM		$523.24		149497
558386	PCTurboPro	PO Box 54838		Manama		54838	BHR		D	M	2067302606	marketing1@globedat.com	Nov 22 2006 4:06PM		$1,829.72		364444

Attachment Z

558386

Welcome M
Edit Profile | Log Out

- Manage Account
- Account Summary
- > Account Funding
  - Deposits
  - Refunds
  - Spending Cap
- Traffic Sources
- Country Settings
- Competitor Block
- Display URL
- Account Status
- Cancel Account
- Monthly Summary

Advertiser Service

If you have any questions or need assistance setting up your account, please contact Advertiser Services.

- Phone: 602-265-5242
- Email Us
- Live Chat

Helpful Links

FAQs
Terms & Conditions
ROI Reporting

Account Funding

Account Information for 558386

Your Account is Currently Inactive, with a balance of:-($4.72)

Once your account has been funded and activated, you will begin receiving traffic to your listings within one hour. New accounts must wait for account review before being activated by client services within 1 to 2 business days.

You are currently on the PrePayment plan.

1) Payment Option

Please select your payment option that best suits your business.

- Directed Traffic will be automatically deducted from your deposit.
- You have complete control over how much you want to spend.

O Non-stop plan Keep your account up and running without interruption. Your account will be automatically replenished by this amount when your balance is low with an amount you predetermine.

Charge: $50.00 each time my account runs out.

Do not exceed $ Please Select per month.

⊙ Pre-payment Just looking to get your account back up and running? Simply select the amount you want to spend. When your account is depleted, your keyword listings, instant responses and access to the guest requests will be taken offline until you add money to your account. We will notify you when your account gets low.

Charge*: Select

*You must select a specific dollar value to charge when funding your account. If you are only modifying your email alert status below, you do not need to select a dollar value from the "Charge" pull-down box.

Send Email Alert When Balance Goes Below: No Alert

Please Press Submit For Changes To Take Effect.

Credit Card Information

* All Credit Card Charges Will Appear On Your Statement As AdOn Network Account - myGeek.

Account Information for 558386

⊙ Use Existing Credit Card Information

Name on Card	Daniel Sundin
Card Type	VISA
Card Number	xxxx-xxxx-xxxx-1225

O Or Enter a New Card

Please be aware that changes to your account can take up to 24 hours to become effective. Credit Card authorization may take a couple of minutes. Please click only once.

Submit

MGC01204

From: Kristy Ross
Sent: Monday, June 26, 2006 03:14 PM
To: Ryan Maloney
CC: 'Geoff Gieron'
Subject: Re: checking in

Ryan,

Sure - here are some of the clients we have in our budget:

Ipodpremium.com
Noadware.net
Errorprotector.com
Systemdoctor.com
Kpremium.com
Errorsafe.com
Getfreecar.com
Winantivirus.com
Drivecleaner.com

Thanks,
Kristy

On 6/26/06 5:39 PM, "Ryan Maloney" <ryan@mygeek.com> wrote:

Is it possible to get a sampling of urls that you are looking a potentially running on our network? This will help us put together something in the way of a package-type proposal.

From: Kristy
Sent: Thursday, January 11, 2007 09:45 PM
To: Ryan Maloney
CC: 'Paul Stephensen'; 'Geoff Gieron'
Subject: Re: Wire payment sent out

Ryan,

Yes the wire is coming from the bank I mentioned (15k). It should be there Friday morning at the latest, usually it only takes a day or two.

Yes I suppose we should put $3k additional to cognac5.

Also I will send another $15k as I mentioned tomorrow, but I believe it will not go out until Monday.

Thanks,
Kristy

On 1/11/07 8:01 PM, "Ryan Maloney" <ryan@adonnetwork.com> wrote:

> Hi Kristy -
>
> Thank you for the wire information (assuming that's how the $15K is
> arriving?).
>
> We funded cognac4 first thing this morning, so it's up and active again. Of
> the $3K I transferred to cognac5, $1K remains - should I transfer another
> $3K?
>
> You know - you can also pre-pay via Paypal.
> Simply e-mail: ebattle@mygeek.com
>
> Let me know on the transfer to cognac5,
>
> Ryan Maloney
> 602-797-8443 - phone
> ryan@adonnetwork.com
>
>
> -----Original Message-----
> From: Kristy [mailto:kristy@globedat.com]
> Sent: Thursday, January 11, 2007 12:41 PM
> To: Ryan Maloney
> Subject: Wire payment sent out
>
> Ryan,
>
> I sent a payment out today for $15,000.00 Here are the details:
>
> Innovative Marketing, inc.
> bank: skandinaviska enskilda banken
>
> It should arrive tomorrow at the latest I would hope. Are we able to get
> any further credit into the account for now? The main account cognac4 is
> offline. I will try to get another wire out tomorrow, but it may not go out
> til Monday.
>
> Thanks,
> Kristy
>

MGC01169

From: Kristy Ross
Sent: Friday, September 30, 2005 07:20 PM
To: Geoff Gieron
Subject: Re: Winfixer issue

Geoff,

Thanks for the email. We seem to have had this issue a few times lately with various locations. Sometimes it seems the ISP caches an ad from another source and it displays it for a day or two before the DNS refreshes. We had this problem with some international locations as well. Do you have any information as to where this may be happening (city or state wise, or in some country)? I think it may be related to some of the session IDs the programmers use. I will try to get the team to research it ASAP. I am in France right now and it is working fine here. I understand their reason to temporarily suspend it of course. I'll work on possibly getting another page to work in the meantime with them. Unfortunately I'm not sure if I'll be abe to get a resolution until Monday, they are often difficult to contact over the weekend.

Thanks
Kristy

----- Original Message -----

From: Geoff Gieron
To: 'Kristy Ross'
Cc: robert@mygeek.com
Sent: Friday, September 30, 2005 11:43 PM
Subject: Winfixer issue

Kristy,

Good afternoon! We are seeing something odd with winfixer ads and was hoping you could help so we can get the traffic volume back up. One of our distribution points brought to our attention that we are seeing your links spawn the prompts to download and ext pop to get the user to download...however inside our office we see the ad correctly for this link.

I sent the link to several people outside our offices who are seeing it with the several prompts as the distribution partner mentioned.

Can you let me know what is potentially going on here and how we can get the download to be consistent to only be downloaded from the second page? The partner has no problem with winfixer ads, just has issue with the method of delivery and user complaints on his end. He has blocked winfixer until this is resolved - which is why the volume suddenly dropped. Any help would be great!

Here is the link we used and screenshots.

http://www.winfixer.com/pages/scanner/index.php?aid=mgwf1lid=comp=3ax=0

When I clicked this one, it took me to my browser window, and then this popped up (see attachment 'Link 1').

MGC00292

Attachment BB

When I clicked 'cancel', it took me to this site (see attachment 'Link 1 Cancel').

Geoff Gieron

Director, Advertiser Management Services

myGeek.com

AdOn Network

602-265-5242

602-297-4219 (fax)

geoff@mygeek.com

!DSPAM:433db18e322901209442312!

From: Kristy Ross
Sent: Friday, June 02, 2006 02:31 PM
To: Geoff Gieron
CC: robert@mygeek.com
Subject: Re: Error Protector and Drive Cleaner issue - need your help please :)
Attachments: image.jpg

Geoff,

I don' think anything was done at all to the accounts, I wasn't notified about anything. I've never even seen a popup that looks like that in any stuff I have done. Will check into it. It is the same thing on both? Would be a bit weird?

Thanks,
Kristy

On 6/3/06 2:10 AM, "Geoff Gieron" <geoff@mygeek.com> wrote:

Kristy,

We just started getting calls this afternoon on your two accounts 554472 (errorprotector) and 553971 (drivecleaner) for loading the error message below and attempting install on the user's pc. It seems to have just started this afternoon. Is there any way to get this to go back to how it was being displayed before. I am seeing it normal on my end, but had a friend test it and he got the message below. Let me know so I can get the partner that called turned back on for your accounts.

Thank you :-)

Geoff

From: Mike Romoff
Sent: Friday, June 02, 2006 12:42 PM
To: Robert McDaniel
Subject: FW: Preliminary Creatives with Active X

Hey Robert -

Have been getting lots of complaints about activex registry ads coming through. Can you check if these are coming from you?

Have had to shut down a lot of volume while we get them removed.

Thanks,

Mike

We are getting Active-X from these pops. The following creatives tried to initiate program installs:

All of which loaded the following web pages:

http://www.errorprotector.com/free/soft2.php?aft=mger1_in2_exitlft=search

http://drivecleaner.com/.freeware/download2.php?ad=1cdm_us_en_exitlink=internetaff=

Which then initiates the following download:

http://bin.errorprotector.com/Install-Errorprotector-Free.exe

http://files.drivecleaner.com/installdrivecleanerstart.exe

Also, this one prompted a Trojan Download:

MGC01605

From: Mike Stocker
Sent: Wednesday, August 31, 2005 05:32 PM
To: Chad Little
CC: Robert McDaniel
Subject: RE: partner id URL

Chad-

Thanks for the response- I just went to the test link and got the winfixer ad again, and that thing is an aggressive and bad ad- I do not wan't that campaign running on our users at this point- the ads are too aggressive.

Can you block this advertiser?

Thanks,

Mike Stocker

Netblue

From: Chad Little [mailto:little@mygeek.com]
Sent: Wednesday, August 31, 2005 5:24 PM
To: Mike Stocker
Cc: Robert McDaniel
Subject: Re: partner id URL
Importance: High

Mike

Robert is gone for the day -- winfixer is a RON advertiser. Robert can provide some input in the morning to check the feed and make sure keywords are working properly.

I'll also follow-up with him now and ask him to look at it if possible to look at it tonight.

best

chad

----- Original Message -----

From: Mike Stocker

To: Chad Little

Cc: Robert McDaniel

Sent: Wednesday, August 31, 2005 5:18 PM

Subject: RE: partner id URL

Guys-

My tech team is telling me they are only seeing winfixer ads- is that true or something that we have set up wrong on our end? Are they buying a lot? Blanket buy?

Thanks,

Mike Stocker

Netblue

From: Chad Little [mailto:little@mygeek.com]
Sent: Wednesday, August 31, 2005 3:06 PM
To: Mike Stocker; Robert McDaniel
Subject: Re: partner id URL

Mike

i laughed outloud! --- great news (we hope)

Robert -- please pay close attention to the feeds so we follow-up on tomorrow.

best

chad

----- Original Message -----

From: Mike Stocker

To: Robert McDaniel

Cc: Chad Little

Sent: Wednesday, August 31, 2005 2:21 PM

Subject: RE: partner id URL

Robert/Chad-

I'm told by my engineers that you should begin seeing some impressions as early as tomorrow. Whether this will happen or not, I'm not sure, but I will cross my fingers.

Thanks for your patience!

Mike Stocker

Netblue

From: Robert McDaniel [mailto:robert@mygeek.com]
Sent: Wednesday, August 31, 2005 2:18 PM
To: Mike Stocker
Subject: RE: partner id URL

Mike,

Just touching base to see where things stand with the feed implementation. Do you have a launch eta yet?

Thanks,

Robert

-----Original Message-----
From: Mike Stocker [mailto:mstocker@netblue.com]
Sent: Friday, August 19, 2005 10:03 AM
To: Robert McDaniel
Subject: RE: partner id URL

Robert-

You are lightning fast! Thanks!

Mike

From: Robert McDaniel [mailto:robert@mygeek.com]
Sent: Friday, August 19, 2005 9:56 AM
To: Mike Stocker
Cc: Chad Little; Robert McDaniel
Subject: RE: partner id URL

Mike,

If you want to display the result directly (i.e. not receive back an XML result), use a URL in the following form:

http://url.cpvfeed.com/cpv.jsp?p=110276url=http://www.orbitz.comcontext=[Page Title Text here]

That has your partner ID 110276 in it. Just replace the URL with the URL the client is viewing and put the page's title text in the context parameter (if available).

Let me know if you have any questions.

Thanks,

Robert

----- Original Message -----

From: Mike Stocker

To: Chad Little

Sent: Friday, August 19, 2005 9:26 AM

Subject: partner id URL

Chad-

Can you send me the link that we would need from you guys to pop a landing page- with our correct partner id in it?

Thanks,

Mike Stocker

Senior Manager, Business Development

MGC01329

Netblue, Inc.

650-810-1352 -office

650-380-2945 -cell

650-810-1300 -fax

The information in this e-mail message may be privileged, confidential, and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this e-mail message in error, please e-mail the sender and delete all copies. Thank you.

From: Robert McDaniel
Sent: Wednesday, August 31, 2005 07:52 PM
To: Mike Stocker; Chad Little
CC: Robert McDaniel
Subject: RE: partner id URL

Mike,

I took a look at the feed and did see some other ads in the rotations - T mobile, registry cleaner, and passion were a few.

By the 'test link' are you meaning the one in the spec or the one down farther in this email string? I know the URL with the orbitz URL in it is returning the winfixer ad every time - indicating that we don't have any other coverage for that right now.

As Chad mentioned, Winfixer is doing a couple different buys in our network. One is targeted on a wide range of keywords, and the other is for RON. Therefore, they can end up being displayed a lot depending on the keywords found and our current coverage. Late in the day will see more as well due to daily caps.

We can block that advertiser from your feed. I'll ask our Advertiser Services group to do that in the morning. What we've done for one other traffic partner was to cap a certain amount of winfixer ads in their traffic per day (e.g. we started out around $400 per day cap and are inching it up to find a good level at which to run it in that traffic). That could reduce the frequency/aggressive nature of it, if that would address your concerns. Let me know if you'd like to consider doing that.

I'll confirm with you in the morning when it's been turned off.

Thanks,

Robert

-----Original Message-----
From: Mike Stocker [mailto:mstocker@netblue.com]
Sent: Wednesday, August 31, 2005 5:32 PM
To: Chad Little
Cc: Robert McDaniel
Subject: RE: partner id URL

Chad-

Thanks for the response- I just went to the test link and got the winfixer ad again, and that thing is an aggressive and bad ad- I do not wan't that campaign running on our users at this point- the ads are too aggressive.

Can you block this advertiser?

Thanks,

Mike Stocker

Netblue

From: Kristy Ross
Sent: Friday, September 01, 2006 03:49 PM
To: Geoff Gieron; Ryan Maloney
CC: geoff@mygeek.com
Subject: Re: quick question
Attachments: image.gif

Geoff,

Also something to consider is that many sources who don't want to run antivirus, etc is because they are Spyware/Adware companies. We are 100% able to keep their product OUT of the database if they are willing to run the advertisements. You might also consider presenting that.. I can do it with all the software sources we run.

-Kristy

On 9/1/06 5:41 PM, "Geoff Gieron" <geoff@adonnetwork.com> wrote:

Kristy,

We do believe that this is the case and we are going to get you back into the source we closed down first thing next week once the traffic source parses out the sources that were ok with those ads and places the ones that do not want spyware removal, registry cleaner, anti-virus ads running on their traffic.

Thank you for being so responsive and know that Ryan and I are big advocates of yours in any situation like this.

Geoff Gieron
AdOn Network

From: Kristy Ross [mailto:kristy@globedat.com]
Sent: Friday, September 01, 2006 12:17 PM
To: Ryan Maloney
Cc: geoff@mygeek.com
Subject: Re: quick question

I think there are a few other partners who are running ads via Mygeek (and of course we advertise directly with a lot of people who are on Mygeek as well). It could always be a problem with those as well.

-kristy

On 9/1/06 1:56 PM, "Ryan Maloney" <ryan@adonnetwork.com> wrote:
Hi Kristy -

We just saw similar ads and some of the traffic partners were complaining so we just wanted to make sure that the ads we originally loaded remained without any changes. No worries.

When you have the new links ready, just send them over and I'll get them loaded into the feed.

Thanks!

Ryan Maloney

From: Kristy
Sent: Thursday, March 29, 2007 03:28 PM
To: Ryan Maloney
CC: 'Geoff Gieron'
Subject: Re: New account setup
Importance: High

Interesting and unfortunate as I know we alone have spent well over a million dollars with your company. Will your company be doing any transitioning of deals to networks that do wish to continue the relationships with software? You are the only the second company ever we have encountered (we have some 500 advertising deals) that has terminated software entirely. The other being Bestoffers. Might be of interest to some of your other publishers to continue such relationships.. Let me know if you guys have any ideas on transitioning the deals directly to them.

Thanks,
Kristy

On 3/29/07 6:19 PM, "Ryan Maloney" <ryan@adonnetwork.com> wrote:

> Hi Kristy -
>
> Unfortunately, I have some news to share that will undoubtedly affect the
> great relationship Globedat and myGeek/AdOn have benefited from for the last
> few years.
>
> The official word has come down from management that we will no longer be
> running ads from any advertiser that sell products in the area of spyware,
> antivirus, registry cleaner, system doctor, evidence eraser, and the like.
>
> It was a difficult decision, but it was made to support the health and
> growth of our network. We've had too many incidents where the relationships
> with our traffic partners have been threatened and we just can't afford the
> risk any longer.
>
> Let me be clear and state that we will of course run any other products you
> have to offer.
>
> We will continue to run the campaigns in all of your active accounts as is,
> until April 17. I will also make sure that they stay funded through that
> date. After that date, the accounts will be shut off. Further, starting
> immediately, I can't approve any new campaigns that offer the aforementioned
> products. So, with respect to your request below, I won't be able to carry
> out that request. However, as you pointed out in your other e-mails today,
> you are correct in guessing that we started seeing international traffic on
> the CPC side. As such, I will go ahead and fund those accounts. I'll reply
> to that e-mail when I've completed the fund transfers.
>
> Please let Geoff and I know if you have any questions.
>
> Regards,
>
> Ryan Maloney
> 602-797-8443 - phone
> ryan@adonnetwork.com
>
> -----Original Message-----
> From: Kristy [mailto:kristy@globedat.com]
> Sent: Thursday, March 29, 2007 8:51 AM
> To: Ryan Maloney
> Subject: New account setup
>
> An additional new account I would like to set up:

>
> link: http://gn.web-fastserve.com/ad/ck/7484-47282-7784-0
>
> Please add it to an account with the following keywords:
>
> erase
> clear
> Junk
> Clean
>
> For right now it should be US only and the account should be Deactivated (so
> we can turn it on when we are ready to try the new software).
>
> Please move $500 from main cognac4 account
>
>
> Thanks,
> Kristy
>
>

YAHOO! ACCOUNT MANAGEMENT TOOL

Login Name:	**no_name_inc**
Properties Used:	**Briefcase** **Mail**
Yahoo Mail Name:	**no_name_inc@yahoo.com**
(Alternate) Email Address:	
Registration IP address:	**212.82.213.58**
Account Created (reg):	**Tue Mar 06 12:12:25 2007 GMT**
Other Identities:	**no_name_inc (Yahoo! Mail)**
Full Name	**Mr NoName Inc. NoName Inc.**
Address1:	
Address2:	
City:	**Cincinnati**
State, territory or province:	**OH**
Country:	**United States**
Zip/Postal Code:	**45211-2619**
Phone:	
Time Zone:	**et**
Business Name:	
Business Address:	
Business City:	
Business State:	
Business Country:	**us**
Business Zip:	
Business Phone:	
Business Email:	
Account Status:	**Active**

Search in all for: no_name_inc

AMT - no_name_inc

Yahoo! Login Tracker

Expand Batch Viewer

Search Results

Login	IP Address	Day	Date	Time	Timezone
no_name_inc	194.140.237.200	Sat	2007-12-22	10:36:27	GMT (GMT+0000)
no_name_inc	194.140.237.200	Sun	2007-12-23	21:19:23	GMT (GMT+0000)
no_name_inc	194.140.237.200	Mon	2007-12-24	09:28:54	GMT (GMT+0000)
no_name_inc	194.140.237.200	Mon	2007-12-24	10:04:13	GMT (GMT+0000)
no_name_inc	194.140.237.200	Mon	2007-12-24	12:36:48	GMT (GMT+0000)
no_name_inc	194.140.237.200	Mon	2007-12-24	15:07:21	GMT (GMT+0000)
no_name_inc	82.207.63.236	Mon	2007-12-24	22:27:56	GMT (GMT+0000)
no_name_inc	194.140.237.200	Tue	2007-12-25	11:07:05	GMT (GMT+0000)
no_name_inc	194.140.237.200	Tue	2007-12-25	12:35:17	GMT (GMT+0000)
no_name_inc	194.140.237.200	Tue	2007-12-25	18:05:11	GMT (GMT+0000)
no_name_inc	194.140.237.200	Wed	2007-12-26	12:27:20	GMT (GMT+0000)
no_name_inc	194.140.237.200	Wed	2007-12-26	18:55:09	GMT (GMT+0000)
no_name_inc	194.140.237.200	Thu	2007-12-27	08:53:31	GMT (GMT+0000)
no_name_inc	194.140.237.200	Thu	2007-12-27	12:27:48	GMT (GMT+0000)
no_name_inc	82.207.61.114	Sun	2007-12-30	12:48:02	GMT (GMT+0000)
no_name_inc	194.140.237.200	Wed	2008-01-02	09:59:23	GMT (GMT+0000)
no_name_inc	194.140.237.200	Thu	2008-01-03	16:26:52	GMT (GMT+0000)
no_name_inc	194.140.237.200	Fri	2008-01-04	16:59:17	GMT (GMT+0000)
no_name_inc	194.140.237.200	Wed	2008-01-09	09:58:37	GMT (GMT+0000)
no_name_inc	194.140.237.200	Wed	2008-01-09	18:35:11	GMT (GMT+0000)
no_name_inc	194.140.237.200	Tue	2008-01-15	14:11:10	GMT (GMT+0000)
no_name_inc	194.140.237.200	Mon	2008-01-21	16:48:23	GMT (GMT+0000)
no_name_inc	194.140.237.200	Wed	2008-01-23	14:34:23	GMT (GMT+0000)
no_name_inc	194.140.237.200	Fri	2008-01-25	10:46:22	GMT (GMT+0000)
no_name_inc	194.140.237.200	Wed	2008-01-30	12:12:18	GMT (GMT+0000)
no_name_inc	194.140.237.200	Thu	2008-01-31	09:13:39	GMT (GMT+0000)
no_name_inc	194.140.237.200	Thu	2008-01-31	17:02:58	GMT (GMT+0000)
no_name_inc	194.140.237.200	Fri	2008-02-01	11:32:31	GMT (GMT+0000)
no_name_inc	194.140.237.200	Fri	2008-02-01	18:51:35	GMT (GMT+0000)
no_name_inc	194.140.237.200	Mon	2008-02-04	13:47:15	GMT (GMT+0000)
no_name_inc	194.140.237.200	Mon	2008-02-04	21:55:53	GMT (GMT+0000)

31 results found.

DomainTools

IP Information for 194.140.237.200

IP Location: Ukraine Kiev 04073 Ukraine Kyiv
Resolve Host: office-nat.imu.kiev.ua
IP Address: 194.140.237.200 [W] [R] [P] [D] [T]
Blacklist Status: Clear

Whois Record

```
inetnum:        194.140.237.0 - 194.140.237.255
netname:        IMU-NET
descr:          04073, Ukraine, Kyiv
descr:          160 Frunze st.
country:        UA
org:            ORG-IMU1-RIPE
admin-c:        IMU-RIPE
tech-c:         IMU-RIPE
status:         ASSIGNED PI
mnt-by:         RIPE-NCC-HM-PI-MNT
mnt-by:         IMU-MNT
mnt-lower:      RIPE-NCC-HM-PI-MNT
mnt-routes:     IMU-MNT
mnt-domains:    IMU-MNT
source:         RIPE # Filtered

organisation:   ORG-IMU1-RIPE
org-name:       Innovative Marketing Ukraine
org-type:       OTHER
address:        04136, Ukraine, Kyiv
address:        Severo-Syretskaya st, 160
e-mail:         no..@innovativemarketing..com.ua
mnt-ref:        IMU-MNT
mnt-by:         IMU-MNT
source:         RIPE # Filtered

role:           Innovative Marketing Ukraine NOC
address:        04136, Ukraine, Kyiv
address:        Severo-Syretskaya st, 3
e-mail:         no..@innovativemarketing..com.ua
admin-c:        OLAR-RIPE
tech-c:         OLAR-RIPE
nic-hdl:        IMU-RIPE
mnt-by:         IMU-MNT
source:         RIPE # Filtered

route:          194.140.237.0/24
descr:          Innovative Marketing Ukraine
origin:         AS41146
mnt-by:         IMU-MNT
source:         RIPE # Filtered
```

Attachment FF

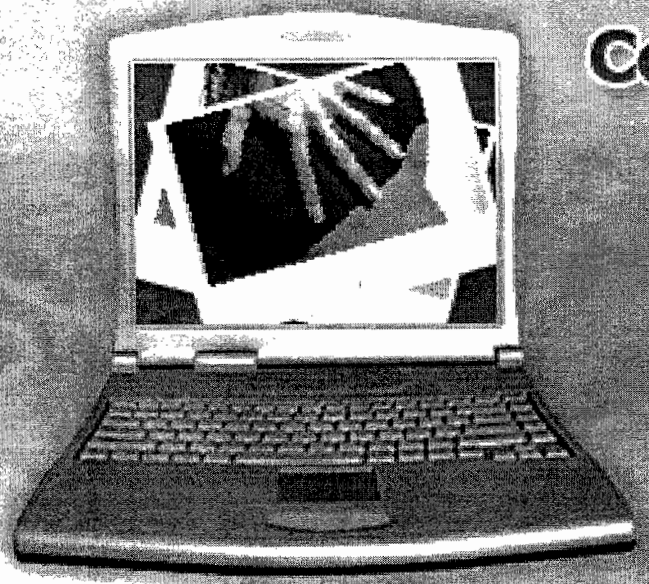
YAHOO! ACCOUNT MANAGEMENT TOOL

Login Name:	**mydomains0**
Properties Used:	**Mail**
Yahoo Mail Name:	**mydomains0@yahoo.com**
(Alternate) Email Address:	**james@setupahost.net**
Registration IP address:	**61.11.80.15**
Account Created (reg):	**Mon Nov 01 05:14:29 2004 GMT**
Other Identities:	**mydomains0 (Yahoo! Mail)**
Full Name	**Mr master hostmaster**
Address1:	
Address2:	
City:	
State, territory or province:	
Country:	**India**
Zip/Postal Code:	**620026**
Phone:	
Time Zone:	**+5.5**
Business Name:	
Business Address:	
Business City:	
Business State:	
Business Country:	**in**
Business Zip:	
Business Phone:	
Business Email:	
Account Status:	**Active**

Attachment HH

Your Privacy is Exposed!

You should clean all compromising evidence to protect your privacy



Compromising files found at your PC

typical system scan

Clean all compromising evidence

Scan your system now and find out what trash files your PC is storing

SCANNING: Done

PROGRESS:

COMPROMISING & INTERNET TRACK FILES FOUND: 316

Scan your system now

To hide your privacy and remove all explicit content press **DOWNLOAD NOW.**

DOWNLOAD

Copyright © 2007 AdvancedCleaner Inc. - All Rights Reserved. - Terms and Conditions - License Information - Privacy Policy

8-cv-03333-RDB Document 3-24 Filed 12/02/08 Page 69 of 170

12:08:38 PM 3/11/2008

FREE ONLINE EXPLICIT CONTENT SCANNER

Your IP Address: REDACTED
Your Computer OS: win xp
You are located in: Unitedstates
Search locations:

Scanning for Adult content...

Scanning item: Done — typical scanning for adult content

Items processed:	18,942	Time elapsed:	00:00:38
Objects found:	259	Time remaining:	00:00:00

☑ Cookies	**452 Found**	☑ Shortcuts	**501 Found**
☑ History	**124 Found**	☑ Temporary Files	**366 Found**
☑ Registry	**352 Found**	☑ Downloads	**389 Found**
☑ Bookmarks	**125 Found**	☑ Emails	**125 Found**

FILES FOUND PREVIEW

AdvancedCleaner found 156 pornographic files in your system

20030319-17_p280...

5mn0701_big(1).mpg

5mn0701_big(1).mpg

eeis_02_img0719.jpg

FM%20with%cums...

PORNOGRAPHY IS FOUND IN YOUR PC
PROTECT YOUR PRIVACY FROM BEING EXPOSED

HIDE MY PRIVACY!

2007 AdvancedCleaner – All rights reserved

Attachment II

WARNING!!! SYSTEM HAS DETECTED EXPLICIT MATERIAL IN YOUR PC

ADULT SITES HAVE STORED FILES ON YOUR PC

Your IP Address REDACTED
Your Computer OS: win xp
You are located in: Unitedstates
Search locations:

Items processed:	28.992
Objects found:	988

Scanning for adult content...

Scanning item: Done — typical scanning for adult content

☑ Cookies	**154 Found**	☑ Downloads	**499 Found**
☑ History	**365 Found**	☑ Emails	**542 Found**

```
10101101010010101      0000101    &*porno_anime.Jpeg*&*(&!")·($gaypom.bmp!&$%
101011010100101010     0011101    *(**&(*gay.gif(*&(*&&!%·&$$www.fuckfest.com!"$
11010100101010101      0000001    $**#www.lesbianporn.com&%#&%porn.jpg$#
1010110101001001101010 0010101    |*/#%&http://www.fuckface.com¬&#$&_&%###$***/
101011010100101011     0010101    */***suckingcock.jpg&#*&&%$#maturespom.gif
0100101010010100101    1110101    $%###%&www.analdestroyer.com((~###%&·$%"
1010110101001001101010 0010101    largedick.jpg&·%!$%#~Clesbian.gif&·%#####$$****
101011010100100111010  0010101    http://www.dickparadise.com/~#C%&..**/"#
10100100110101         0010101    *!&#$!"·$%%bitchsex.com%$&##%**.)()"·$%Fsd
01001010101010101011   1110101    /&!"·$%"·$"##~#%$%$gaylandmovies.com·3#%&
```

All adult sites can and do store information about you. These sites can pop-up on your PC without warning. A lot of these sites are illegal. Keep your Internet activity personal and private.

PORNOGRAPHY IS FOUND IN YOUR PC
PROTECT YOUR PRIVACY

HIDE MY PRIVACY!

2007 AdvancedCleaner - All rights reserevd

12:09:46 PM 3/11/2008

Warning!!! System has traced evidence at your PC

- Adult sites stored explicit materials without your permission
- System is preventing exposure of your privacy now

Your IP Address: REDACTED
Your Computer OS: win xp
You are located in: Unitedstates

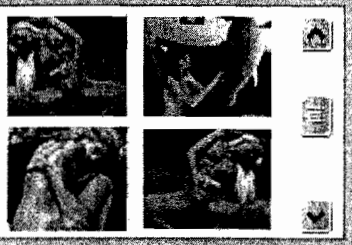
System console adult tracking

10101101010010101	0000101	&*porno_anime.Jpeg*&*(&!")·($ gaypom.bmp!&$%
101011010100101010	0011101	*(**&(*gay.gif(*&(*&&!%·&$$www.fuckfest.com!"$
11010100101010101	0000001	$**#www.lesbianporn.com&%#&%porn.jpg$#
1010110101001001101 01	0010101	|*/#%&http://www.fuckface.com¬&#$&_&%##$***/
101011010100101011	0010101	*/***suckingcock.jpg&#*&&%$#maturesporn.gif
0100101010010100101	1110101	$%###%&www.analdestroyer.com((~###%&·$%"
1010110101001001101 01	0010101	largedick.jpg&·%!$%#~Clesbian.gif&·%####$$****
101011010100100 1110	0010101	http://www.dickparadise.com/~#C%&..**/"#
10100100110101	0010101	**&#$!"·$%%bitchsex.com%$&##%**.)()"·$%Fsd
0100101010101010101 1	1110101	/&!"·$%"·$"##~#%$%$gaylandmovies.com·3#%&

Time elapsed: 00:00:38 **Time remaining: 00:00:00** **Total time processed: 00:00:38**

☑ Cookies	566 Found	☑ Shortcuts	135 Found
☑ History	238 Found	☑ Temporary Files	168 Found
☑ Registry	487 Found	☑ Downloads	469 Found
☑ Bookmarks	124 Found	☑ Emails	489 Found

44 pics found view more



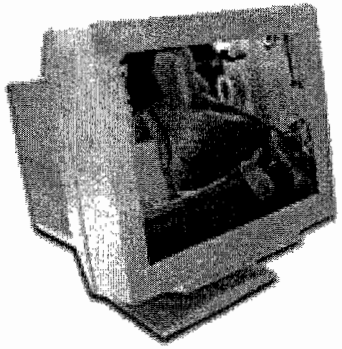
All adult sites save compromising information on your PC without notification. Most of these materials are illegal in Ukraine and may entail penal responsibility.
Make your Internet activities safe and anonymous.

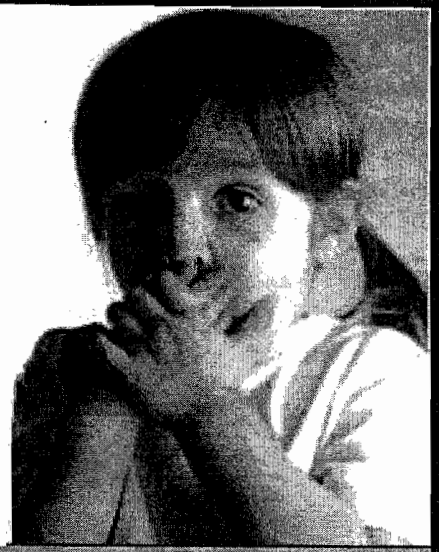
HIDE MY PRIVACY NOW!

2007 AdvancedCleaner - All rights reserved

IT CAN HAPPEN TO ANYONE!

Adult files can download themselves onto your PC completely without your knowledge. Once they have attached themselves to your PC, it is extremely difficult to erase them.





ADULT CONTENT CAN AND WILL APPEAR ON YOUR SCREEN... WITHOUT WARNING!

GIVE YOURSELF PEACE OF MIND AND TOTAL CONFIDENCE WHEN USING YOUR PC BY INSTALLING THE LATEST CLEAN-UP SOFTWARE...

DOWNLOAD NOW

Case 1:08-cv-03233-RDB Document 3-24 Filed 12/02/08 Page 73 of 170

12:11:48 PM 3/11/2008

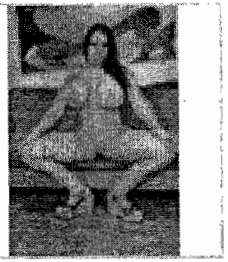
Attachment II

12:12:41 PM 3/11/2008

Privacy Alert!

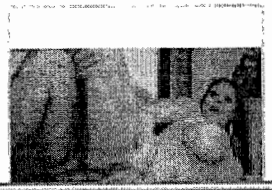
Illegal porn content found on your PC!

Threats observed:



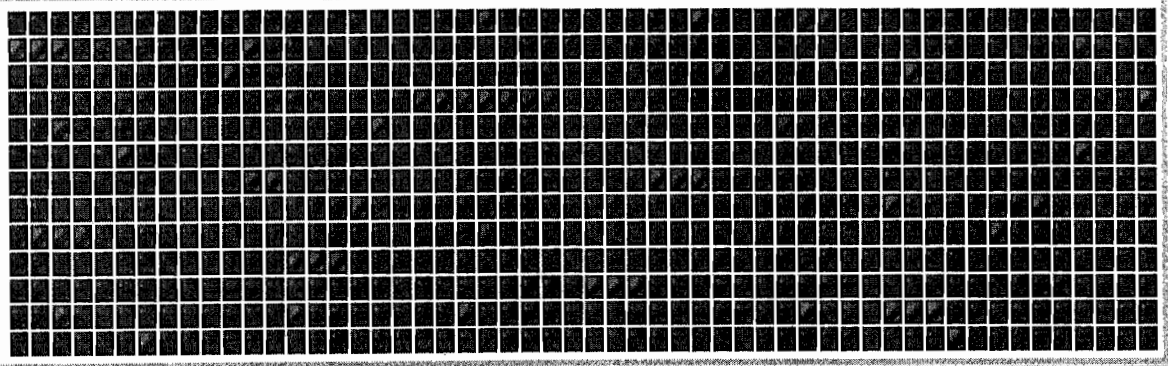
xxx01.jpg

xxx02.jpg



	Filename	Alert Level	Age
⊗	Adult Cookies	High	New
⊗	WinSpyware	High	New
⊗	Porn Pictures	High	New
⊗	Porn Videos	High	New
⊗	Internet History Tracks	Medium	New
⊗	Adult Cookies	High	New
⊗	WinSpyware	High	New
⊗	Porn Pictures	High	New

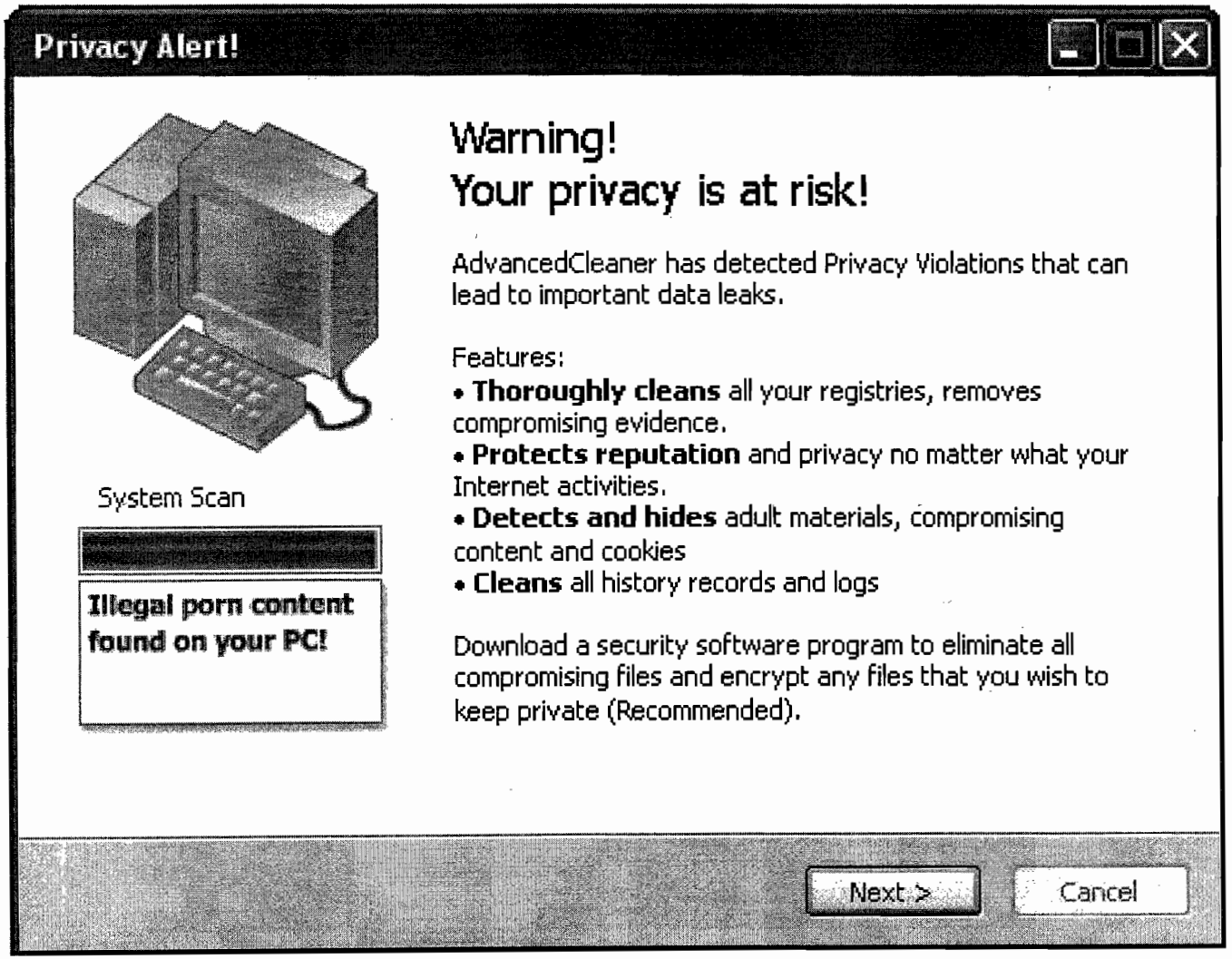
Local Drive (C:)

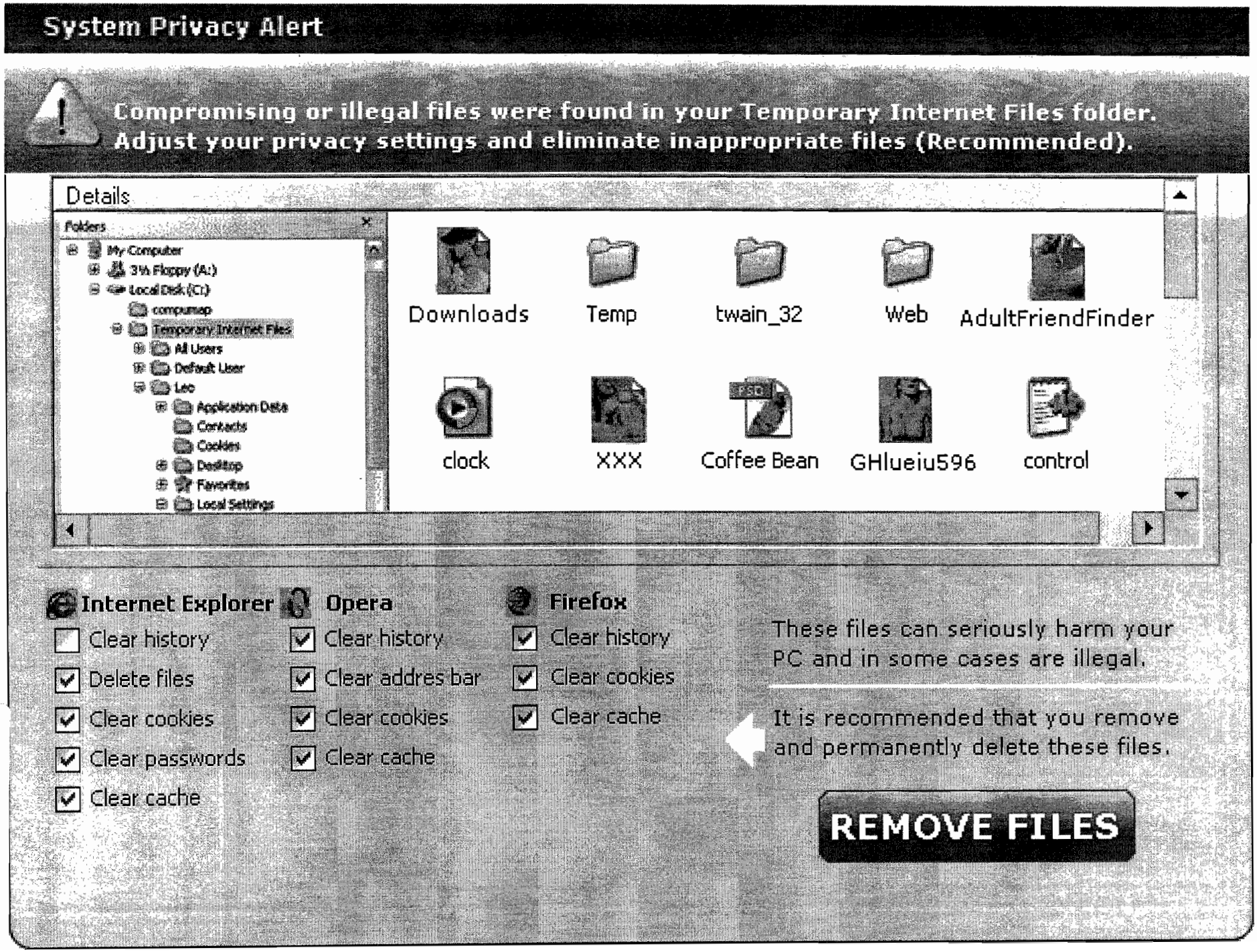


■ - Illegal porn content on your PC

Remove All

Case 1:08-cv-03233-RDB Document 3-24 Filed 12/02/08 Page 75 of 170


Privacy Alert!
Warning!
Your privacy is at risk!
AdvancedCleaner has detected Privacy Violations that can lead to important data leaks.
Features:
• Thoroughly cleans all your registries, removes compromising evidence.
• Protects reputation and privacy no matter what your Internet activities.
• Detects and hides adult materials, compromising content and cookies
• Cleans all history records and logs
Download a security software program to eliminate all compromising files and encrypt any files that you wish to keep private (Recommended).
System Scan
Illegal porn content found on your PC!
Next >
Cancel


System Privacy Alert
Compromising or illegal files were found in your Temporary Internet Files folder.
Adjust your privacy settings and eliminate inappropriate files (Recommended).
Details
Folders
My Computer
3½ Floppy (A:)
Local Disk (C:)
compumap
Temporary Internet Files
All Users
Default User
Leo
Application Data
Contacts
Cookies
Desktop
Favorites
Local Settings
Downloads
Temp
twain_32
Web
AdultFriendFinder
clock
XXX
Coffee Bean
GHlueiu596
control
Internet Explorer
Clear history
Delete files
Clear cookies
Clear passwords
Clear cache
Opera
Clear history
Clear addres bar
Clear cookies
Clear cache
Firefox
Clear history
Clear cookies
Clear cache
These files can seriously harm your PC and in some cases are illegal.
It is recommended that you remove and permanently delete these files.
REMOVE FILES

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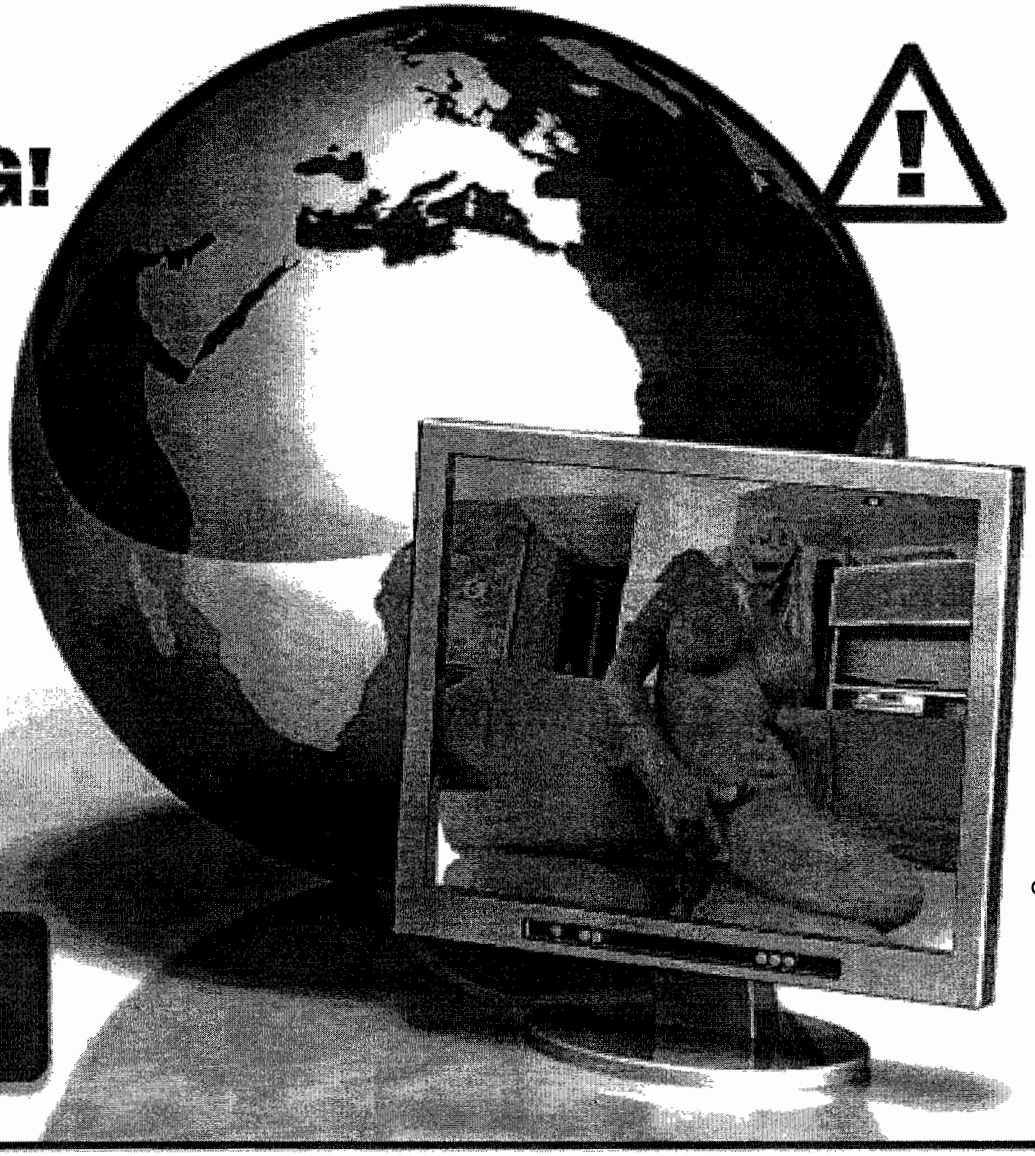
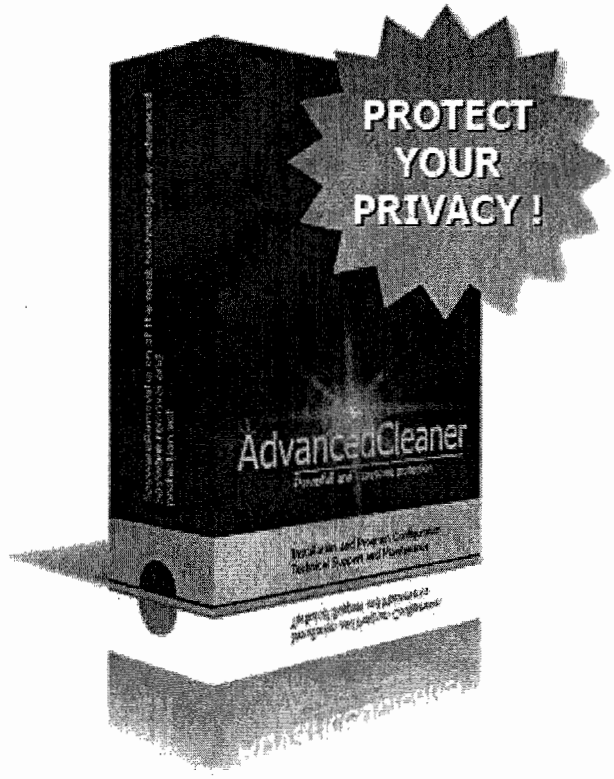
URGENT PRIVACY PROTECTION WARNING!



It is financially & personally extremely dangerous to go online without the protection of a professional privacy software.

AdvancedCleaner is a perfect solution that protects your system, regularly scans and hides all unwanted data and/or compromising contents on your PC. **AdvancedCleaner** prevent potential privacy breaches and violations.

GET PROTECTED!



AdvancedCleaner

All-in-one solution

Comprehensive cleaning and protection for your system that solves your security problems.

AdvancedCleaner is a perfect solution that protects your system, regularly scans and hides all unwanted data and/or compromising contents on your PC.
AdvancedCleaner helps to prevent potential privacy breaches and violations.

TRY NOW BUY NOW

HOME | OVERVIEW | DOWNLOAD | BUY ONLINE | FEATURES | AFFILIATES | C

Latest News

15-February-07, AdvancedCleaner Major Update
Antivir announced new version of SpywareRemoval, its third-generation anti-spyware software, now featuring Active Protection. The latest iteration of the **AdvancedCleaner** series brings this critical protection to the home desktop user.
Active Protection has become a critical component of leading anti-spyware software as infections advance in complexity. You can always download the latest version of **Advanced-Cleaner**.

Latest Threats

- **Trojan.Bakloma.A**
- **Win32.Gattman.A**
- **Trojan.Zapchas.F**
- **JS.Blackworm.A**
- **Trojan.Tibs.E**
- **Win32.Netsky.P@mm**
- **Trojan.Winsys**

92% OF HOME PCS ARE INFECTED!

With Spyware that can't be detected by your Antivirus
No one is immune! Recent studies reveal 92% of computers with an Internet connection to be infected! Commercial websites, "free" software and marketing companies are massively distributing dangerous Spyware that put you at risk.

Why choose AdvancedCleaner?

AdvancedCleaner starts functioning upon installation; it immediately detects compromising contents/cookies and removes them. This is the best solution to erase all evidence stored in your PC. Its features enable you to work safely and without worrying about your reputation. Also, you can schedule regular scans to clean your computer as often as needed. AdvancedCleaner is easily customizable. Choose this software for the best cleaning and protection.

Features

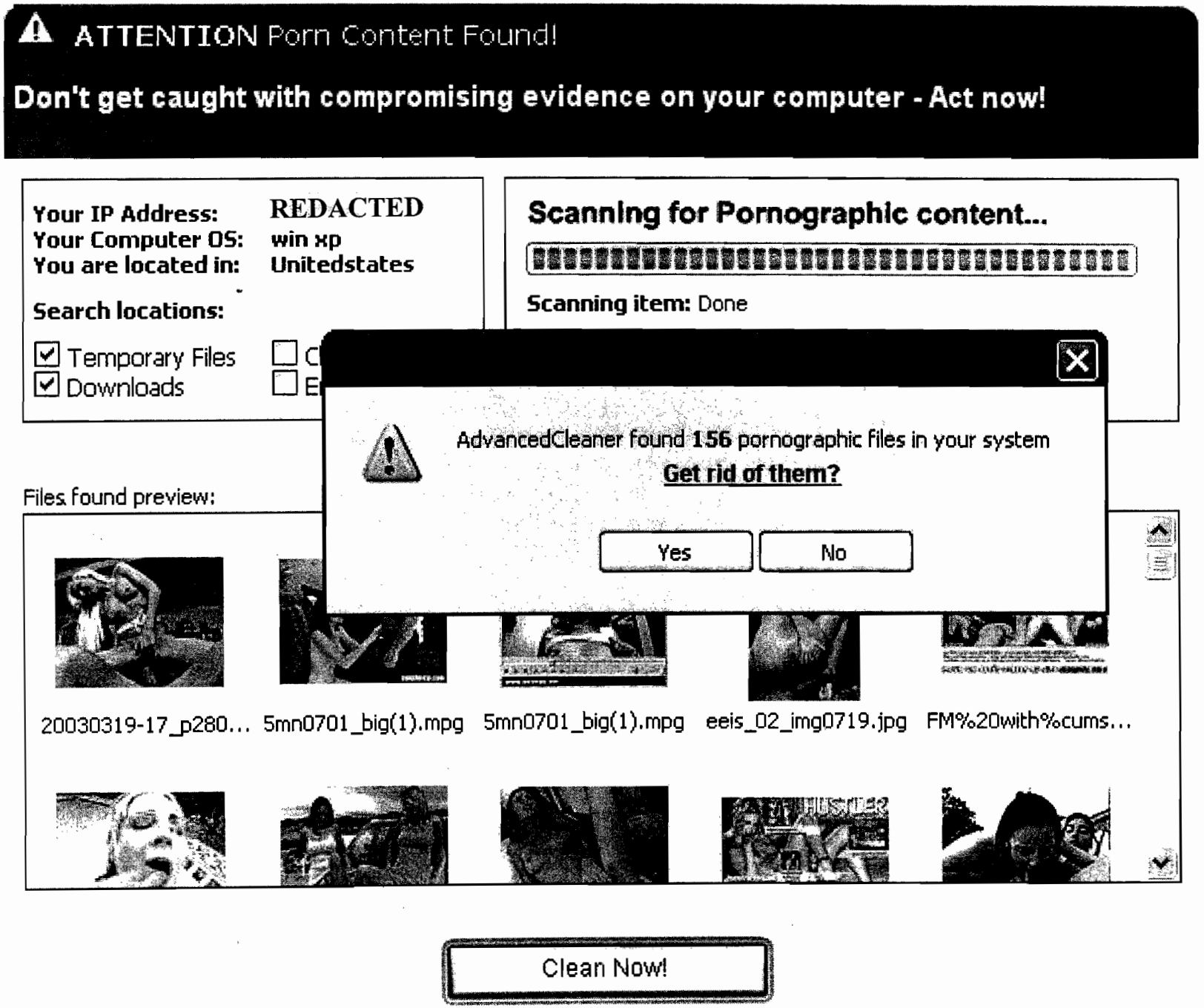
– **Thoroughly cleans all** your registries, removes compromising evidence.

– **Protects your reputation** and privacy no matter what your Internet activities.

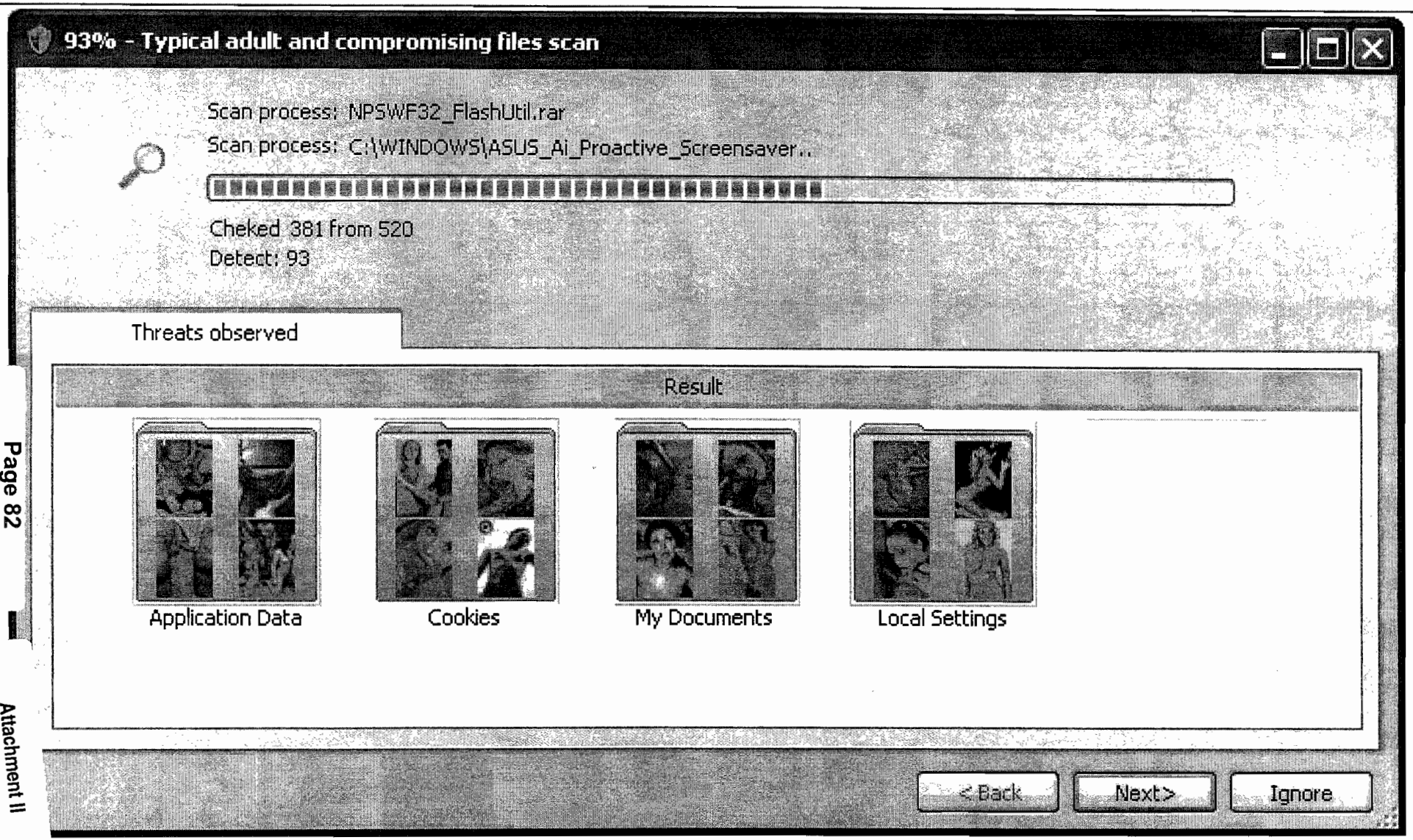
– **Detects and hides** adult material, compromising content and cookies

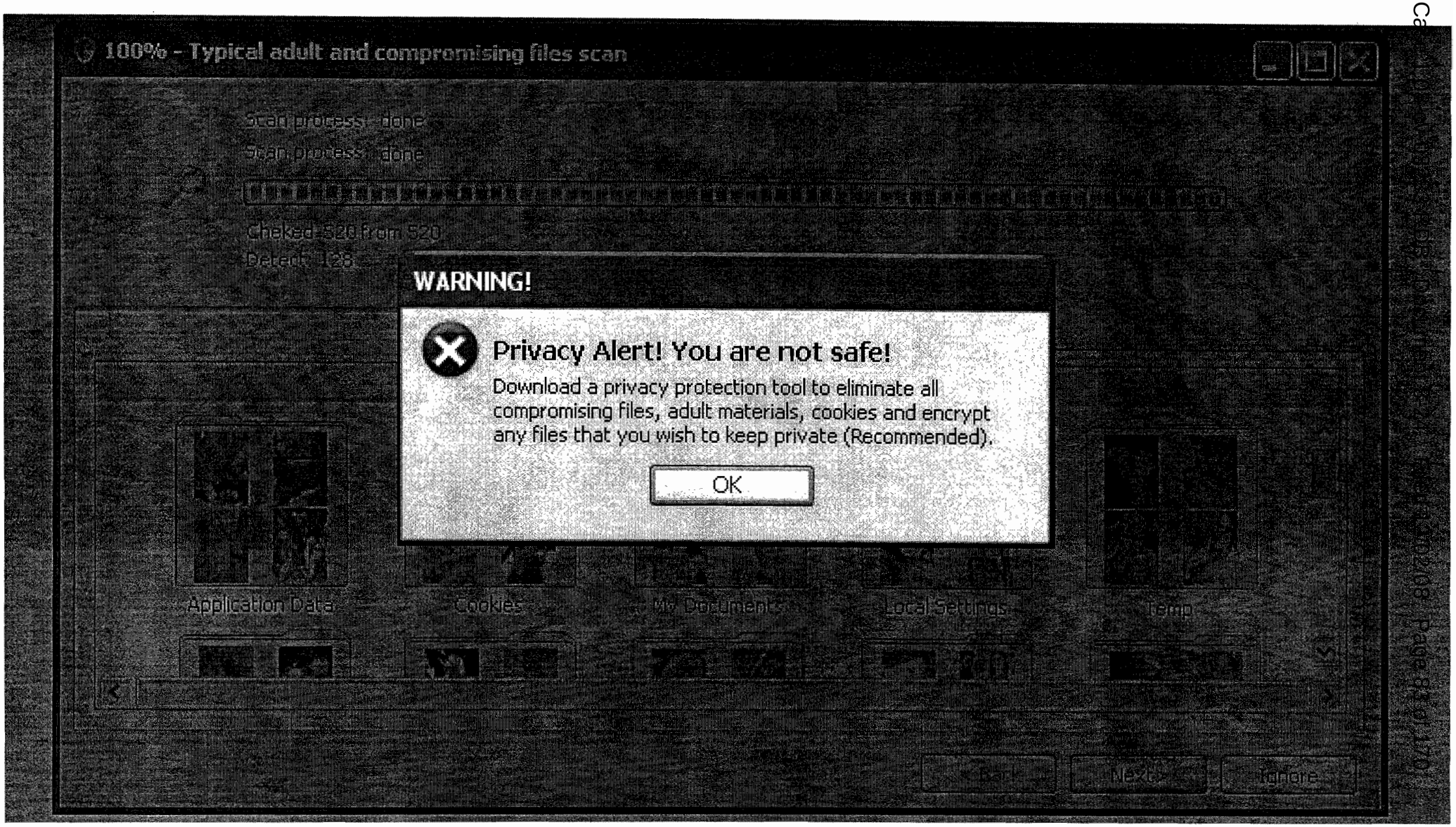
– **Cleans** all history records and logs

Attachment II


ATTENTION Porn Content Found!
Don't get caught with compromising evidence on your computer - Act now!
Your IP Address: REDACTED
Your Computer OS: win xp
You are located in: Unitedstates
Search locations:
Temporary Files
Downloads
Scanning for Pornographic content...
Scanning item: Done
AdvancedCleaner found 156 pornographic files in your system
Get rid of them?
Yes
No
Files found preview:
20030319-17_p280...
5mn0701_big(1).mpg
5mn0701_big(1).mpg
eeis_02_img0719.jpg
FM%20with%cums...
Clean Now!

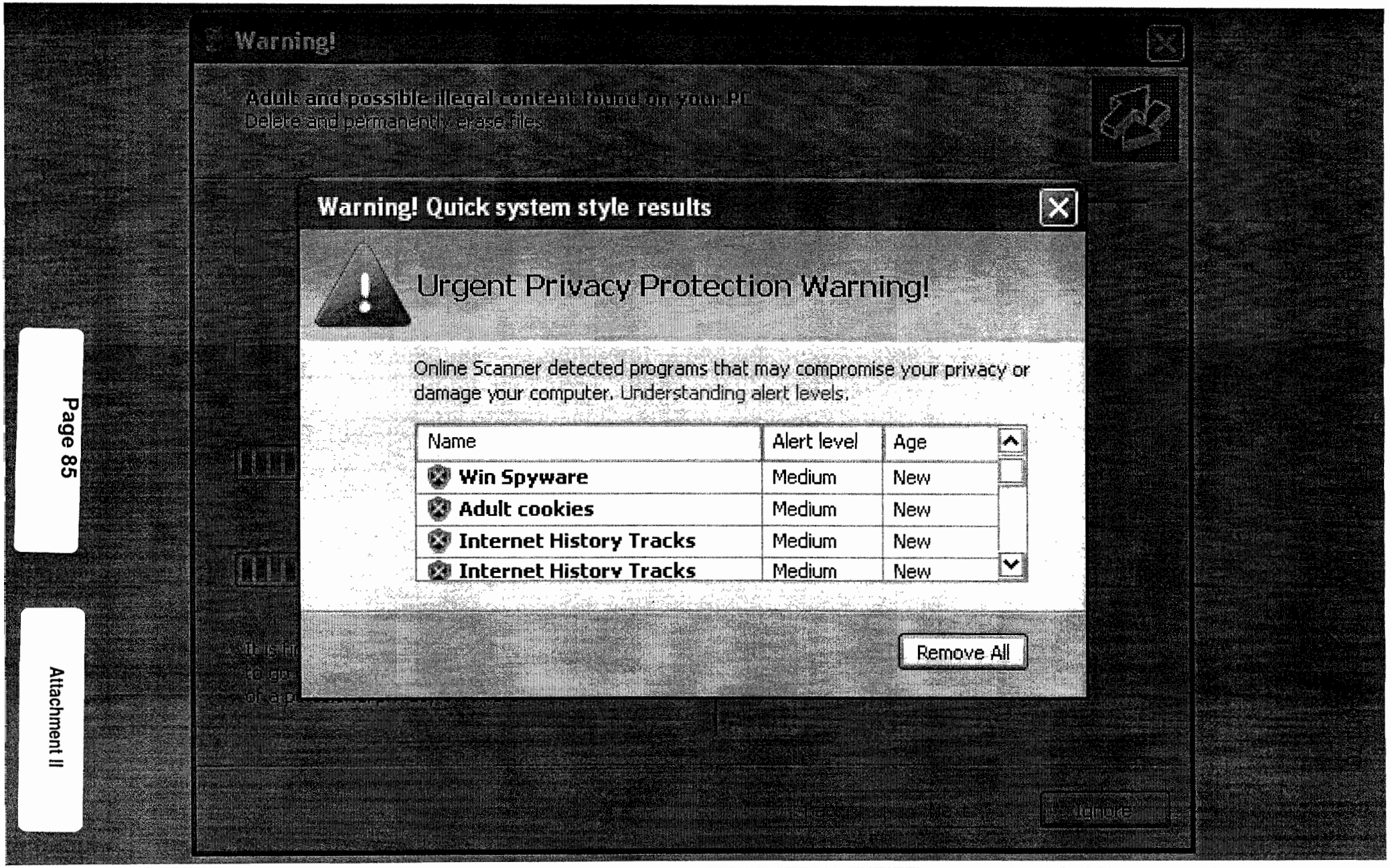
Attachment II


93% - Typical adult and compromising files scan
Scan process: NPSWF32_FlashUtil.rar
Scan process: C:\WINDOWS\ASUS_Ai_Proactive_Screensaver...
Cheked 381 from 520
Detect: 93
Threats observed
Result
Application Data
Cookies
My Documents
Local Settings
< Back
Next>
Ignore

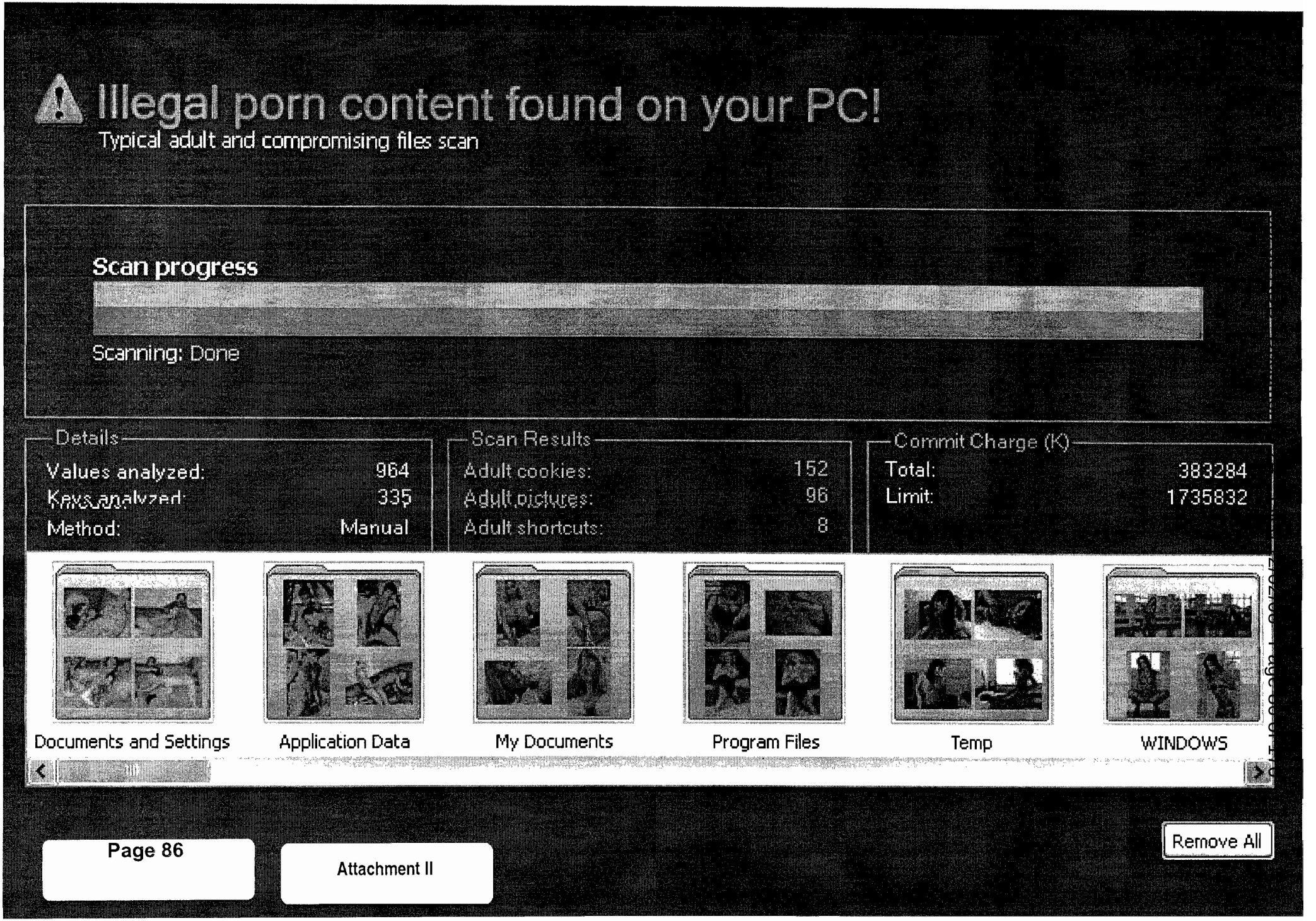

100% - Typical adult and compromising files scan
Scan process : done
Scan process : done
Cheked: 520 from 520
Detect: 128
WARNING!
Privacy Alert! You are not safe!
Download a privacy protection tool to eliminate all compromising files, adult materials, cookies and encrypt any files that you wish to keep private (Recommended).
OK
Application Data
Cookies
My Documents
Local Settings
Temp
Back
Next>
Ignore

12:22:24 PM 3/11/2008

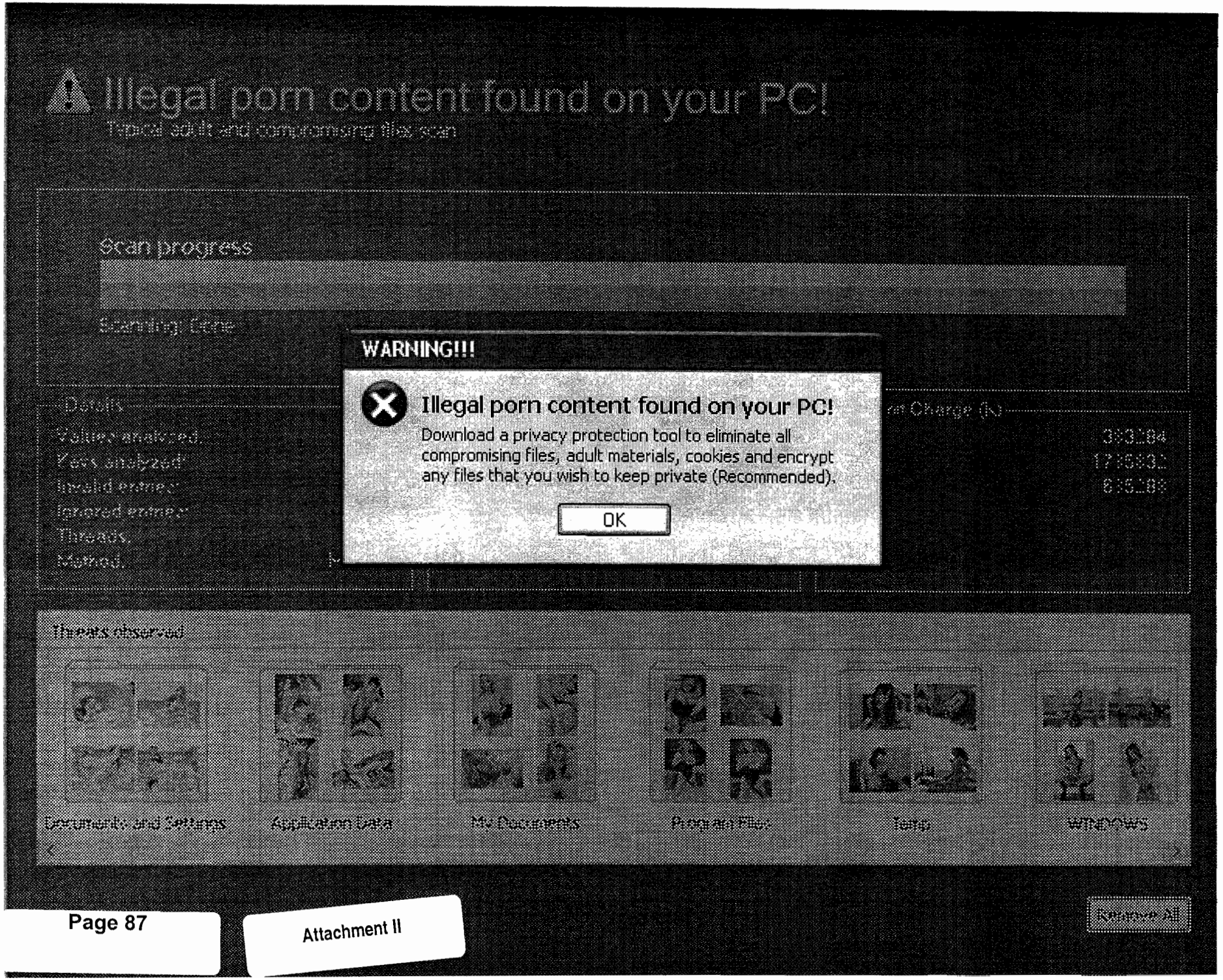
Attachment II


Warning!
Adult and possible illegal content found on your PC
Delete and permanently erase files
Warning! Quick system style results
Urgent Privacy Protection Warning!
Online Scanner detected programs that may compromise your privacy or damage your computer. Understanding alert levels.
Name
Alert level
Age
Win Spyware
Medium
New
Adult cookies
Medium
New
Internet History Tracks
Medium
New
Internet History Tracks
Medium
New
Remove All

12:23:22 PM 3/11/2008



Attachment II



Attachment II

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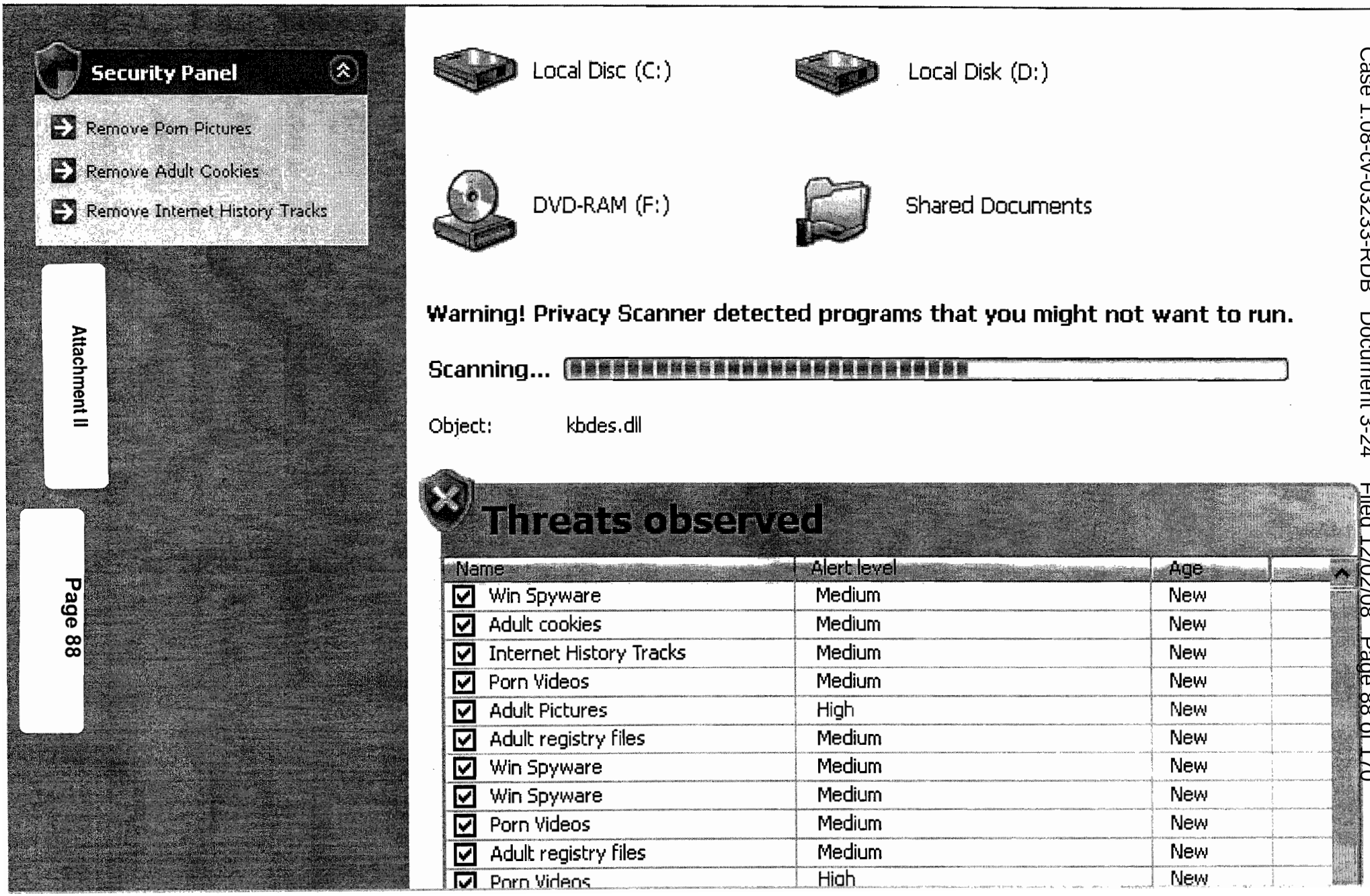

Attachment II

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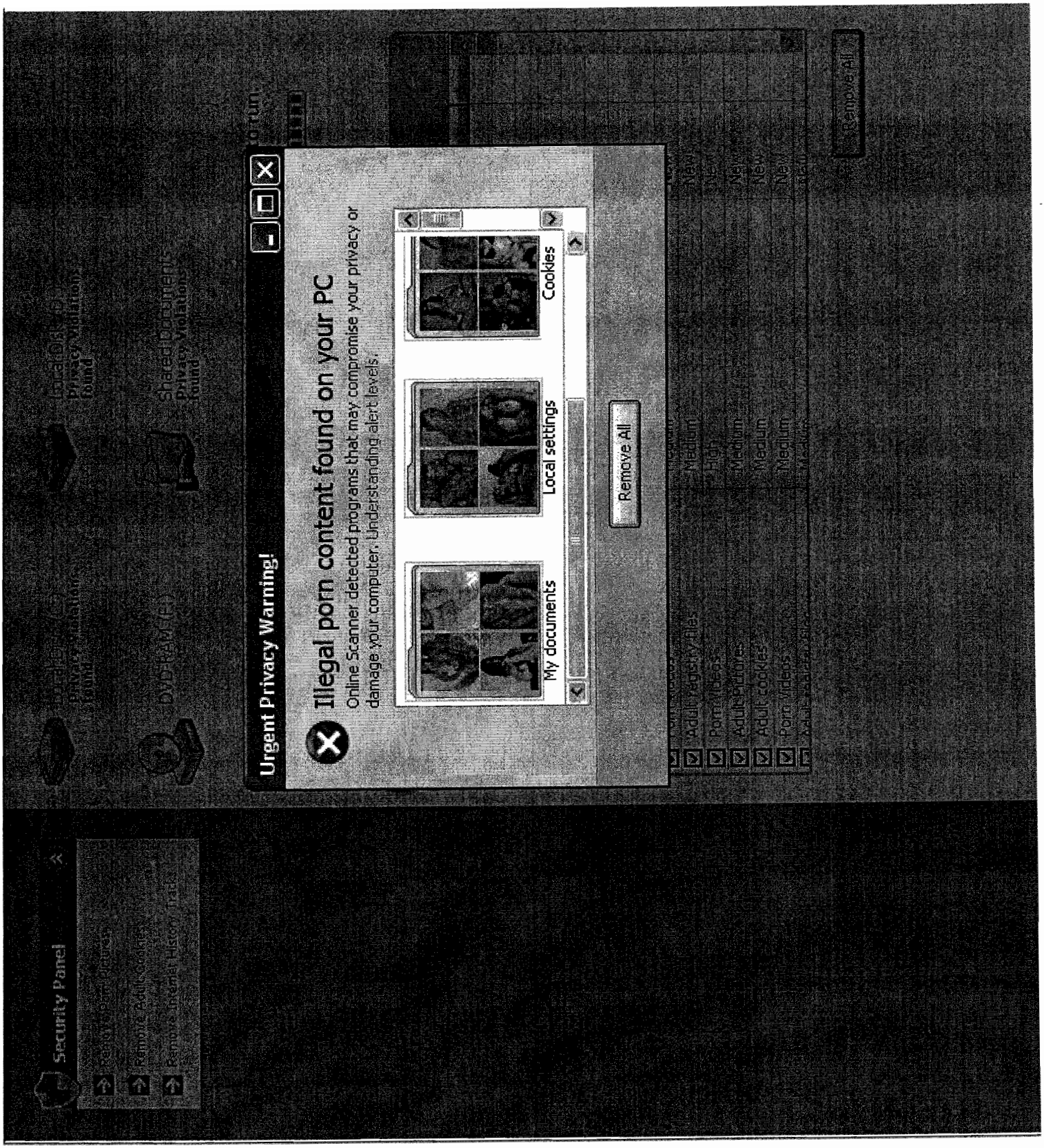
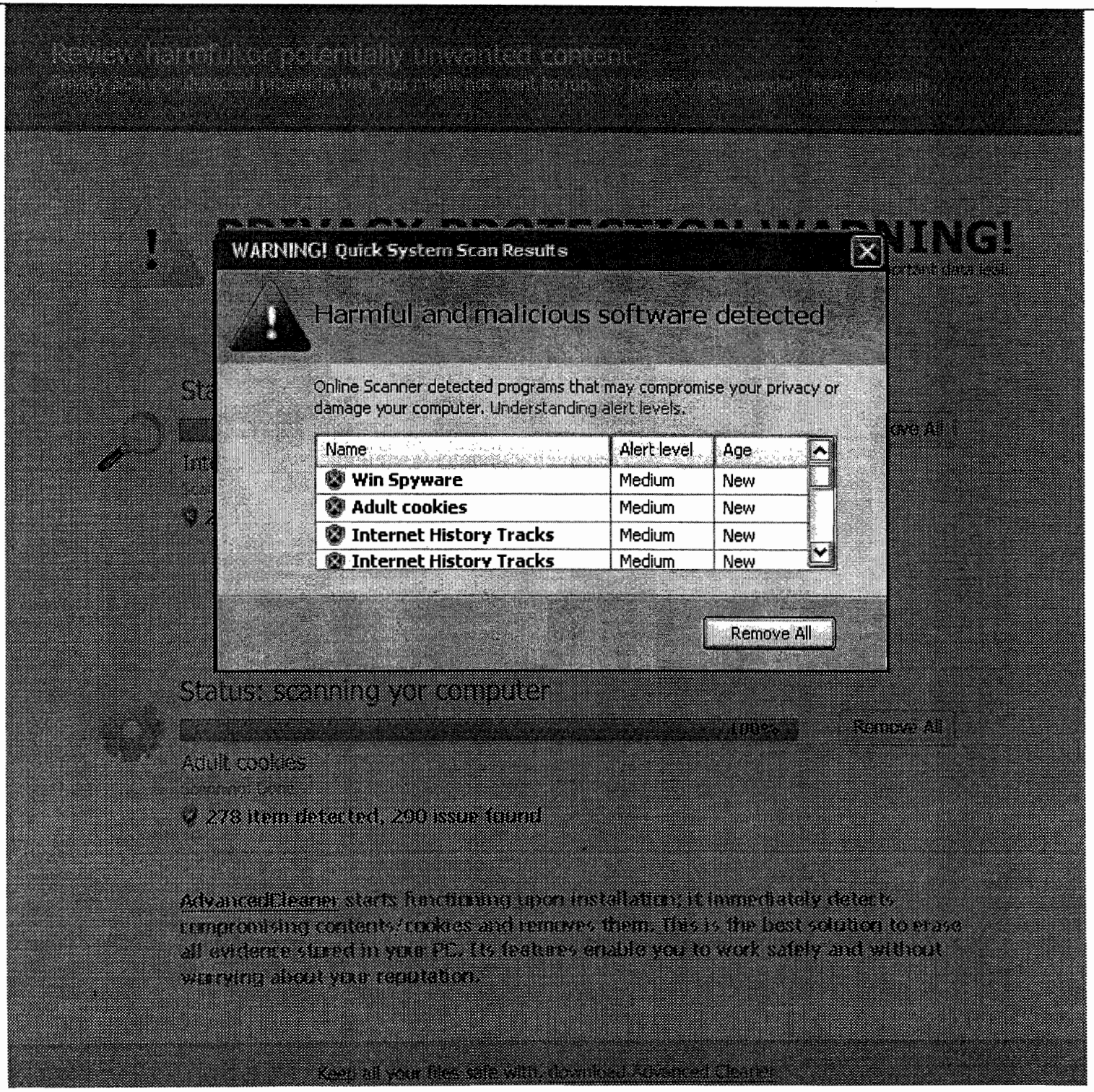
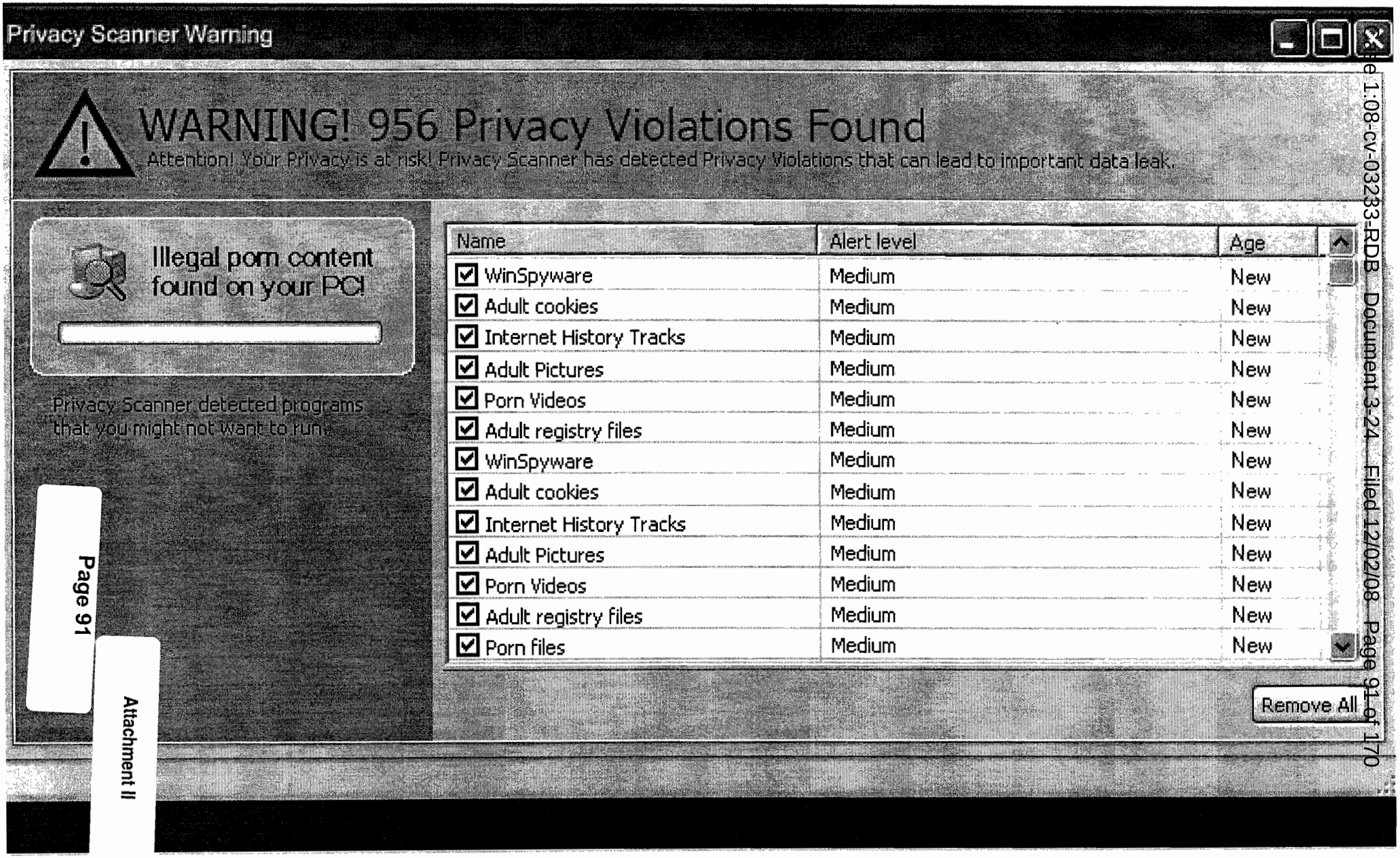


12:24:01 PM 3/11/2008

Attachment II


WARNING! Quick System Scan Results
Harmful and malicious software detected
Online Scanner detected programs that may compromise your privacy or damage your computer. Understanding alert levels.
Name
Alert level
Age
Win Spyware
Medium
New
Adult cookies
Medium
New
Internet History Tracks
Medium
New
Internet History Tracks
Medium
New
Remove All
Status: scanning yor computer
Remove All
Adult cookies
278 item detected, 290 issue found
AdvancedCleaner starts functioning upon installation; it immediately detects compromising contents/cookies and removes them. This is the best solution to erase all evidence stored in your PC. Its features enable you to work safely and without worrying about your reputation.
Keep all your files safe with download Advanced Cleaner!

12:11:11 PM 3/11/2008



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Attachment II

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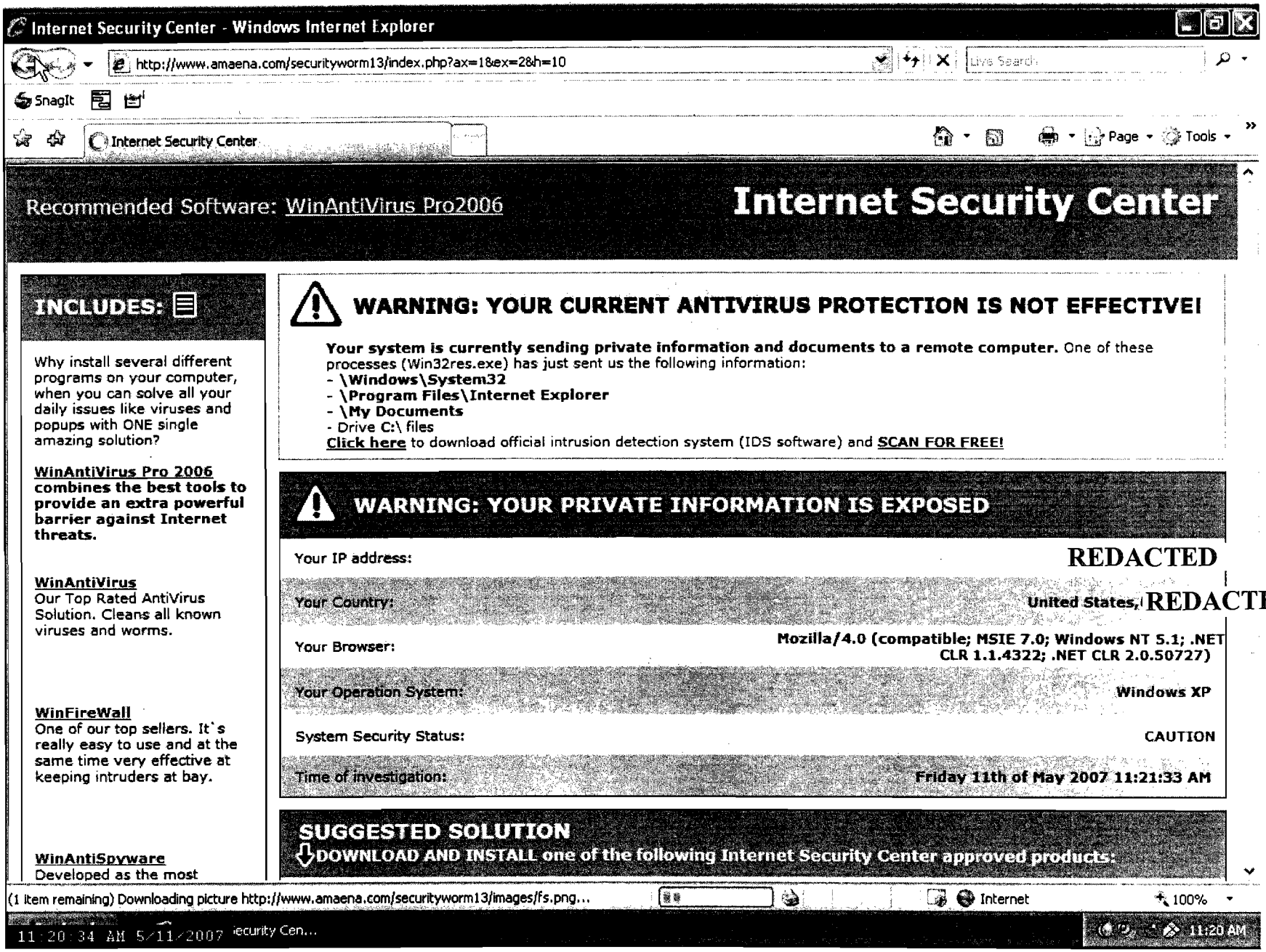
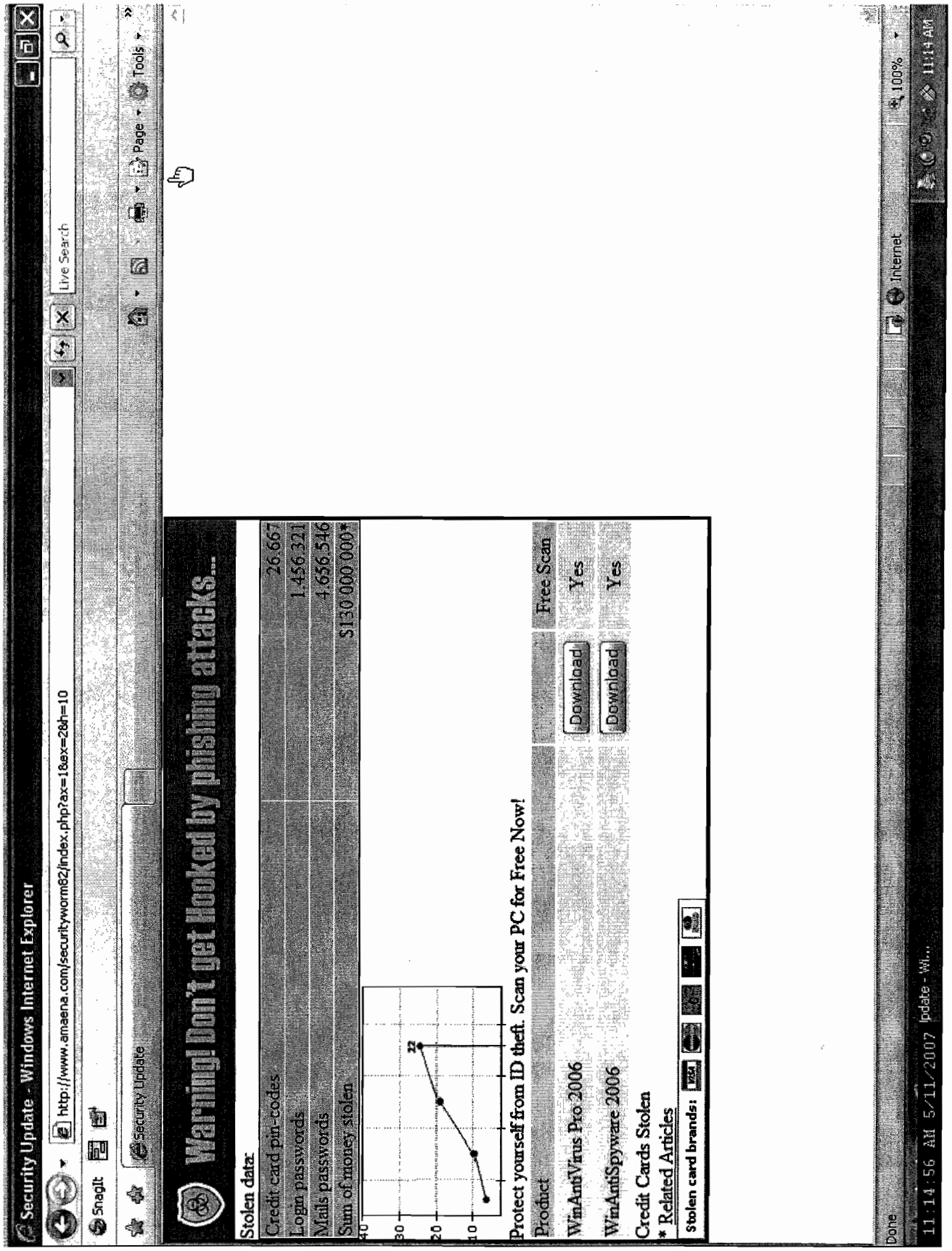
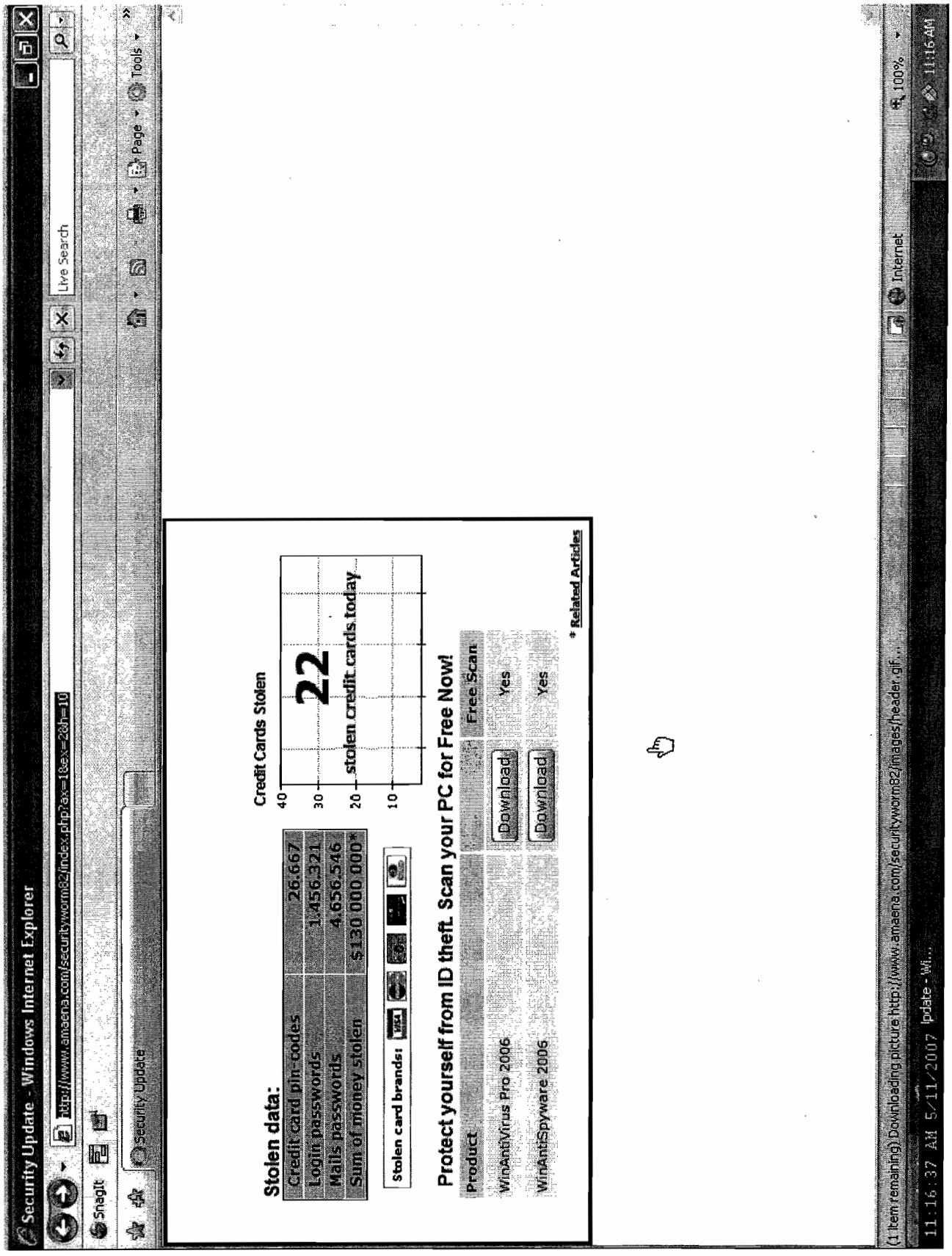

Internet Security Center - Windows Internet Explorer
http://www.amaena.com/securityworm13/index.php?ax=18ex=28h=10
Live Search
SnagIt
Internet Security Center
Page
Tools
Recommended Software: WinAntiVirus Pro2006
Internet Security Center
INCLUDES:
Why install several different programs on your computer, when you can solve all your daily issues like viruses and popups with ONE single amazing solution?
WinAntiVirus Pro 2006 combines the best tools to provide an extra powerful barrier against Internet threats.
WinAntiVirus
Our Top Rated AntiVirus Solution. Cleans all known viruses and worms.
WinFireWall
One of our top sellers. It`s really easy to use and at the same time very effective at keeping intruders at bay.
WinAntiSpyware
Developed as the most
WARNING: YOUR CURRENT ANTIVIRUS PROTECTION IS NOT EFFECTIVE!
Your system is currently sending private information and documents to a remote computer. One of these processes (Win32res.exe) has just sent us the following information:
- \Windows\System32
- \Program Files\Internet Explorer
- \My Documents
- Drive C:\ files
Click here to download official intrusion detection system (IDS software) and SCAN FOR FREE!
WARNING: YOUR PRIVATE INFORMATION IS EXPOSED
Your IP address: REDACTED
Your Country: United States, REDACTED
Your Browser: Mozilla/4.0 (compatible; MSIE 7.0; Windows NT 5.1; .NET CLR 1.1.4322; .NET CLR 2.0.50727)
Your Operation System: Windows XP
System Security Status: CAUTION
Time of investigation: Friday 11th of May 2007 11:21:33 AM
SUGGESTED SOLUTION
DOWNLOAD AND INSTALL one of the following Internet Security Center approved products:
(1 item remaining) Downloading picture http://www.amaena.com/securityworm13/images/fs.png...
Internet
100%
11:20:34 AM 5/11/2007
11:20 AM

Attachment JJ



Attachment JJ

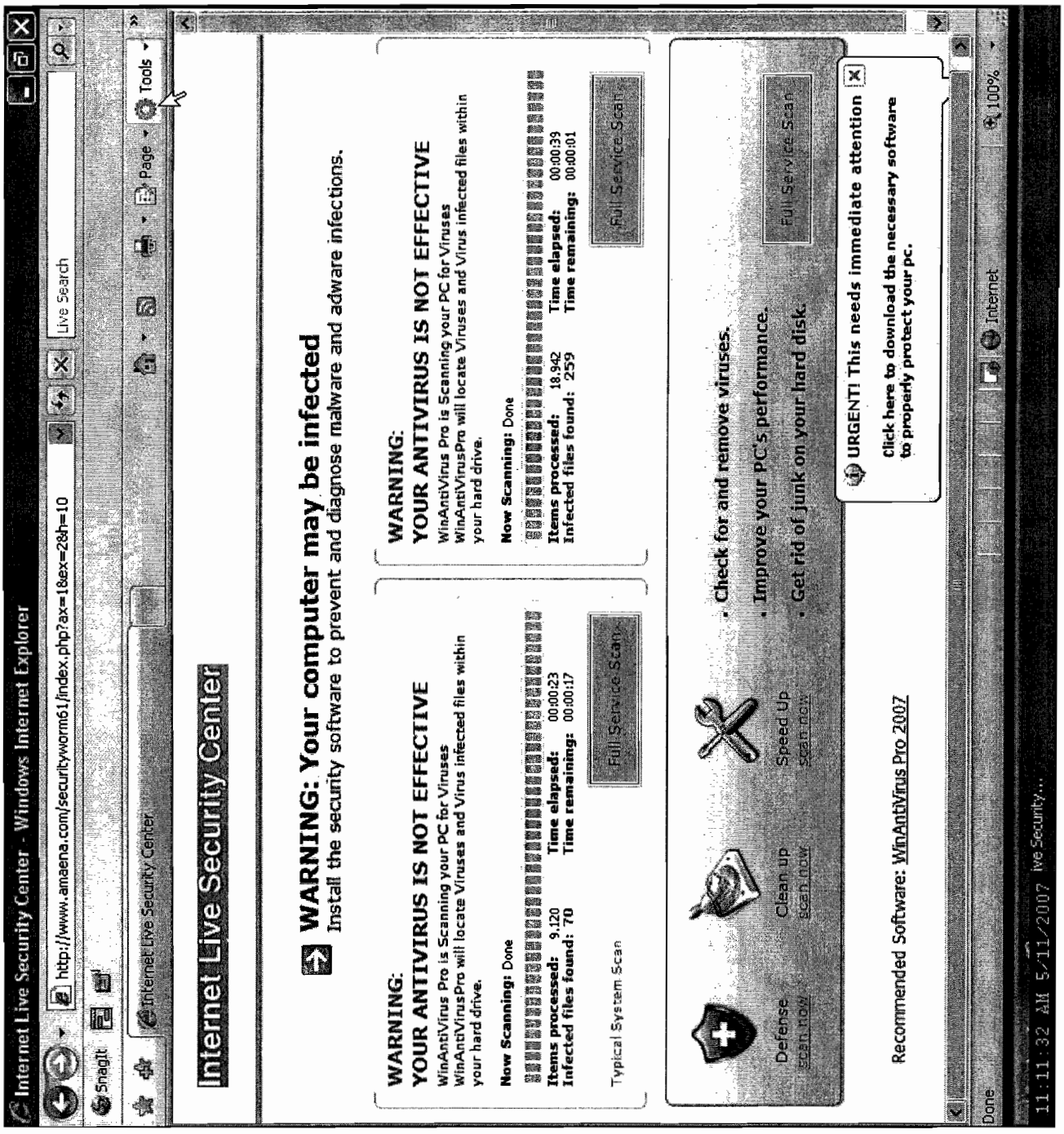


Attachment JJ

Attachment JJ

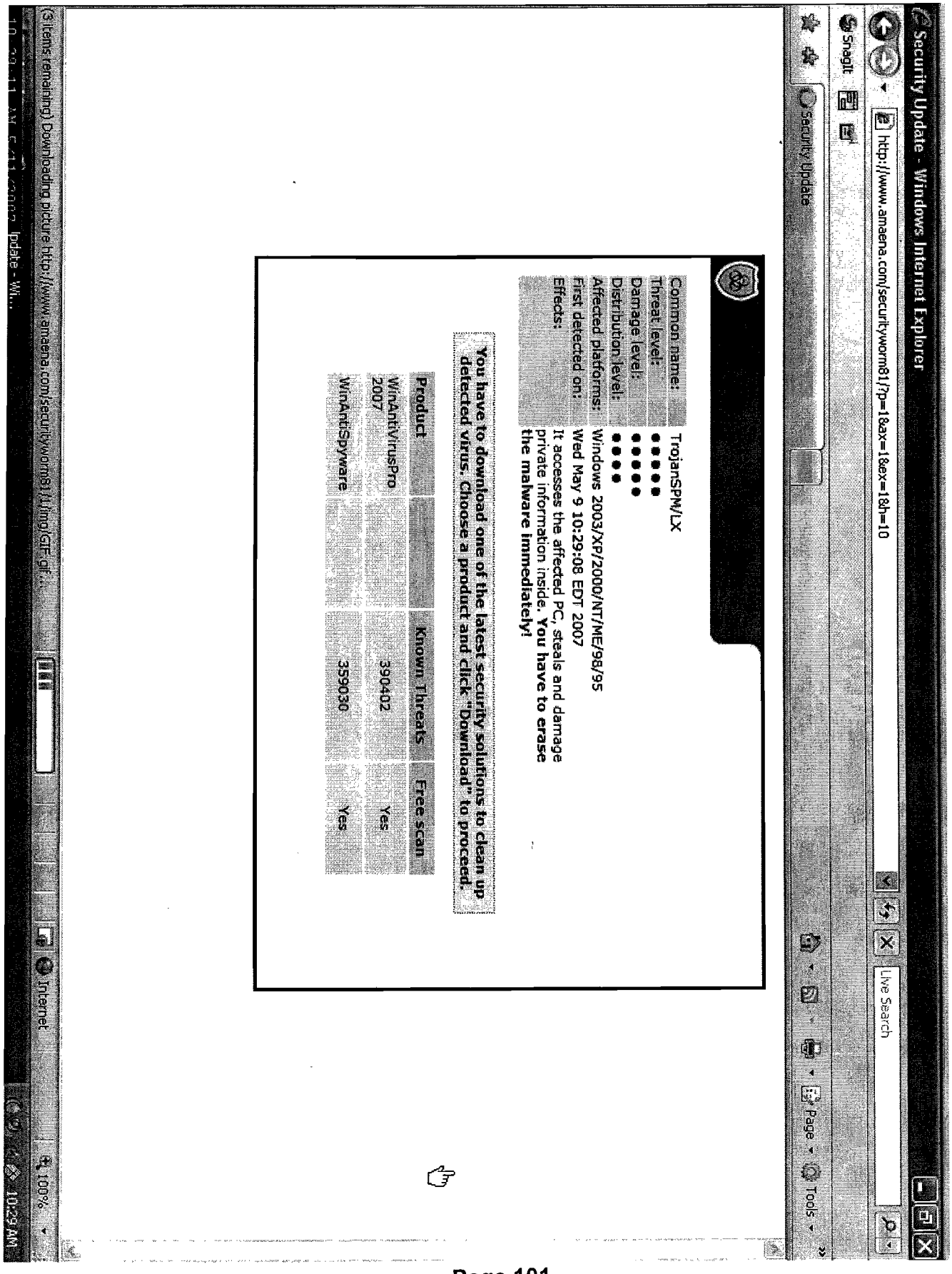
Attachment JJ

Attachment JJ

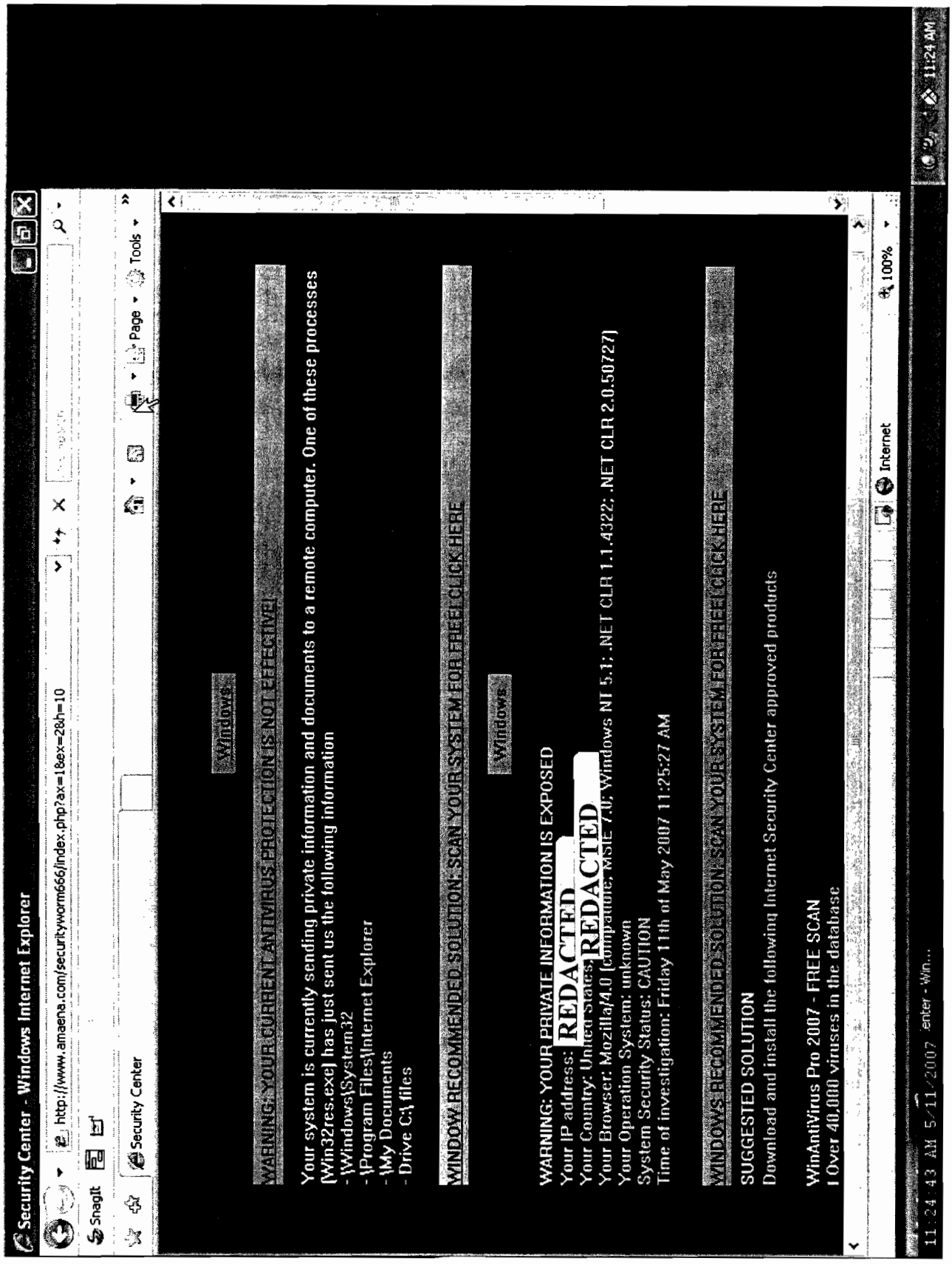


Attachment JJ

Attachment JJ



Attachment JJ



Attachment JJ

Attachment JJ

Attachment JJ

View Full Version : Just got redirected from Tangency...

Perfect Organism 11-15-2006, 05:15 PM

...to some dodgy 'Internet Security' site. Doesn't seem to be anything on my machine which could be responsible, so it looks like it might be a problem with one of the ads on RPGnet.

I seem to recall something similar a few weeks ago, but I thought it had been dealt with.

Mikeythorn 11-15-2006, 05:50 PM

Ditto. I just got redirected when I clicked on one of the "Hot Topic" threads.

eyeballstew 11-15-2006, 06:08 PM

Me too.

Snowblind 11-15-2006, 06:18 PM

I am Spartacus.

I mean "me, too."

Cessna 11-15-2006, 06:30 PM

I'm not getting this, and I just went to about a dozen threads in Hot Topic.

What browser are you using? Try logging out/clearing cookies/etc?

Mikeythorn 11-15-2006, 06:33 PM

I'm using IE at work with pretty heavy duty security attached. It only happened to me that once and I haven't experienced it again. I have logged out and cleared my cookies and will let you know if it happens again.

Mandrion 11-15-2006, 07:14 PM

Just had the same thing happen to me. Firefox 1.5.0.8. The Site was called "SystemsDoctor" or something like that and wanted to conduct a "systems scan". When I tried to close the window, a popup warned me that the "systems scan" was not completed, and when I klicked on cancel it informed me that it would now conduct a systems scan, with only an "OK" option this time. I didn't find out what happened next because I then ended the whole thing via Ctrl-Alt-Del...

pedr 11-15-2006, 07:16 PM

Ditto, on Firefox 1.5.0.8. I used <back> to try to get away from the odd page, got the pop-up box and canceled it using the red X, rather than the cancel button. That worked...

Although the first time my whole Firefox window then decided to resize to only a small box in the corner of the screen.

Burgonet 11-15-2006, 07:43 PM

I did get an attempt to redirect my browser (Firefox 1.something) but I've got it set up to stop such attempts.

Clearing out my cache, cookies et al fixed the problem, only had this re-direct attempt happen once. Never saw where exactly the re-direct was going per se, mainly as I'd not the inclination to check the re-direct URL/location.

Wasn't sure if it was a user (me) issue or something with the larger forums per se but thought I'd mention it here.

Illegible Smudge 11-15-2006, 07:55 PM

I got the same on Firefox 2.0.

Jay 11-15-2006, 08:03 PM

Using 2.0, and nothing. No redirect at all.

MonsterMash 11-15-2006, 08:11 PM

Just had the same thing happen to me. Firefox 1.5.0.8. The Site was called "SystemsDoctor" or something like that and wanted to conduct a "systems scan". When I tried to close the window, a popup warned me that the "systems scan" was not completed, and when I klicked on cancel it informed me that it would now conduct a systems scan, with only an "OK" option this time. I didn't find out what happened next because I then ended the whole thing via Ctrl-Alt-Del...

Same thing happend to me too. Same browser, Win XP home. Just now run AdAware and SpyWare blaster before flushing history and cache. Doesn't seem to be reoccuring.

Lux 11-15-2006, 11:23 PM

Same thing just happened to me in Tangency. Using IE.

:confused:

Patrick O'Duffy 11-15-2006, 11:25 PM

This has happened to me twice today, and to two different sites. The first was the 'SystemDoctor' site others have reported; that happened about 7 hours ago at work, running IE (I don't know what version).

The second time happened about 1 minute ago (this time using Firefox 2.0), again in Tangency, but to a different site with a similar setup - a popup checkbox saying it had to scan my drive/clear my cache to remove evidence I'd visited adult sites. No matter my response, it started fiddling away at something. Here's the URL:

http://www.drivecleaner.com/.freeware/index.php?p=37&a=1&j=0&pp=0&w=0&ex=1&ap=0&mpt=[CACHEBUSTER]&z=11&link=keyin&ad=areweill_au_en_ed1&aff=

Kinda fucked up.

Hafwit 11-16-2006, 12:57 AM

That happened to me as well just now.

uncle_wilf 11-16-2006, 02:03 AM

Just had it. Using Firefox 2 and Windows 2000.

harkon 11-16-2006, 03:13 AM

I'm not getting it, using FF 2.0 running AdBlock Advanced and set to appear offline. I turned off the block I had

on Java script from googlesyndication and I didn't notice a change.

Borogove 11-16-2006, 05:42 AM

I got it earlier, using firefox 1.something and OS X 10.4.

DjtHeutii 11-16-2006, 06:54 AM

I've had it happen to me a couple of times before I set my firewall settings way high.

Edit: I use Firefox

Foyle 11-16-2006, 07:32 AM

Has just happened to me as well using Firefox 1.0.4

florin 11-16-2006, 07:46 AM

I use Firefox 2.0, and I haven't had it happen on any of the three machines I use. Two are Windows XP and one is Ubuntu. I can't imagine it's RPG.net fault if only some of us are getting it.

Has anyone with a Mac or *nix had it happen yet? Edit: Looks like someone with OSX has had it happen.

Heronymus 11-16-2006, 07:53 AM

I use Firefox 2.0, and I haven't had it happen on any of the three machines I use. Two are Windows XP and one is Ubuntu. I can't imagine it's RPG.net fault if only some of us are getting it.

Has anyone with a Mac or *nix had it happen yet? Edit: Looks like someone with OSX has had it happen.

I would guess it's something to do with the member ad settings, maybe? I know nothing about the tech, but could it be a hijack from a malicious ad, and we're not seeing it because the ads are turned off for us as members?

Illegible Smudge 11-16-2006, 08:14 AM

Well, Foyle didn't get it either, but maybe he has ads turned on. The fact that the guy with Adblock on didn't get it might also support your theory.

Hafwit 11-16-2006, 08:20 AM

Oops, I use Firefox and Xandros (Linux).

Foyle 11-16-2006, 08:26 AM

Well, Foyle didn't get it either, but maybe he has ads turned on. The fact that the guy with Adblock on didn't get it might also support your theory.

I did indeed have adds turned on as they haven't really bothered me. But still pretty shitty to be re-directed without clicking on anything other than a thread title. Have turned them off now

Kiero 11-16-2006, 08:33 AM

I've had it happen earlier, using Firefox 1.5.0.8

Loith 11-16-2006, 11:34 AM

I just had the same thing happen.

http://www.amaena.com/securityworm5/?ax=1&ex=1&mpt=[CACHEBUSTER]&aid=areweill

Using Opera 9.02, Windows 2000 Pro.

Thread: http://forum.rpg.net/showthread.php?t=296856 (though this alone won't help to nail it down, I'm sure; if Shannon greps server log with my IP and this thread's URL, I'm pretty certain he might be able to find which ad was guilty one, depending on how httpd's logs are set up.)

Iozz-Sothoth 11-16-2006, 01:22 PM

Happened to me twice today (Internet Explorer, Win XP), both times in TO. First time downloaded some spyware which my scanner caught [1], second time hasn't, as far as the full scan can tell.

[1] If the scanner caught it pretty much immediately, how worried to I have to be about my security? (That is, will it have sent any tasty looking data to persons unknown?)

Kester Pelagius 11-16-2006, 01:23 PM

While this hasn't happened to me, as yet, I am curious about something.

Did anyone notice if any keyword were lit up with that double underline green text?

I have noticed that, from time to time, subject lines will suddenly have a few keywords turn green with a link. Once, as I was clicking, a dialogue box poped up then disappeared (but no redirect I observed).

Is it possible this is what happened/is the culprit?

Iozz-Sothoth 11-16-2006, 01:38 PM

WTF? My firewall was off. That probably explains the redirect, but precisely when did I do something that stupid (and have I been indadvertantly surfing the Net uprotected for the last six months...)

Godfather Punk 11-16-2006, 02:18 PM

For the record a 'Me too' just a minute ago.

Firefox 1.5

I managed to close the tab after some "ESC" hitting to get rid of the pop-up.

Bicorn 11-16-2006, 02:31 PM

Happened to me as well.
Firefox 1.5.0.8, Windows XP, and I have Adblock.
Killed the popup with the 'x' instead of hitting any of the buttons and then used the back button to get back here.

ShannonA 11-16-2006, 02:41 PM

A few people reported the actual URL, which is what I needed. Just reporting the fact lets me know something is up, but doesn't help resolve it. It's been passed on.

Mandrion 11-16-2006, 05:54 PM

Just had the same thing happen again, this time I got redirected to

www.amaena.com/securityworm81/?p=3&ax=1&ex=1&h=10&mpt=[CACHEBUSTER]&aid=areweill

(http://forum.rpg.net)

P.S.: How do I stop this from becoming an automatic link? I think I've worked around it now, but somehow I would prefer a more elegant solution...

Patrick O'Duffy 11-16-2006, 07:52 PM

Another instance, this time using IE on my office PC, while trying to read the 'Neocon Plan' thread in Hot Topic. URL was:

http://www.amaena.com/securityworm81/?p=3&ax=1&ex=1&h=10&mpt=[CACHEBUSTER]&aid=areweill

Saru Sponge 11-16-2006, 08:01 PM

Another instance, this time using IE on my office PC, while trying to read the 'Neocon Plan' thread in Hot Topic. URL was:

http://www.amaena.com/securityworm81/?p=3&ax=1&ex=1&h=10&mpt=[CACHEBUSTER]&aid=areweill

I just got this too.

Ken Finlayson 11-16-2006, 09:17 PM

Add my voice to the choir (Firefox 1.0.4, Mac OS X 10.4.5, reading the thread with Mark Twain's joking reform of the English language)

http://www.amaena.com/securityworm81/?p=3&ax=1&ex=1&h=10&mpt=[CACHEBUSTER]&aid=areweill

Hodden 11-16-2006, 10:51 PM

Happened to me a few minutes ago, I was redirected to:

http://www.amaena.com/securityworm81/?p=3&ax=1&ex=1&h=10&mpt=[CACHEBUSTER]&aid=areweill

And then Norton stepped in and shut everything down, telling me that a virus had been detected.

Pope Nag 11-16-2006, 11:53 PM

And another one. I got redirected to http://nl.winantivirus.com/download/2006/index.php?aid=areweill_ed2&lid=keyin&ex=1&ax=1

so NOT the amaena one. However, I'm dutch, so the nl.winantivirus bit seems to indicate it picks a destination according to your location. That, or we have more than one offender now.

I'm on a mac, system 10.3.9, using Firefox 1.5.0.7.

Elizabeth Brooks 11-17-2006, 03:31 AM

I googled for amaena.com and I keep getting hits on the blackworm virus hoax (http://www.spynomore.com/articles/blackworm-virus-hoax.php) and references to vundo. (http://wiki.castlecops.com/Vundo_Rootkit_Detection_and_Removal_Procedure)

Just to be clear: The blackworm virus hoax involves stuff claiming that blackworm was detected on your machine - there is something going on that shouldn't be, but it probably isn't blackworm. Vundo is itself a virus.

If I search for "winantivirus" and "amaena" I get a lot of hits that imply that popups related to those sites are also related to worms and such. Check this article (http://www.pcmag.com/article2/0,1759,1911061,00.asp) out.

One bit that stood out:

The Rogue Antispyware page at spywarewarrior.com notes that WinAntiSpyware and WinAntiVirus use aggressive advertising, drive sales using false positive results, and inappropriately collect personal data.

answers.yahoo.com (http://answers.yahoo.com/question/index?qid=20061102013533AAk30KD) also mentions this stuff, specifically referencing amaena.com and drivecleaner.com. I mention this link because it connects both sites.

Symantec's page on drivecleaner: (http://www.symantec.com/smb/security_response/writeup.jsp?docid=2006-062217-0726-99)

DriveCleaner is a security assesment tool which gives exaggerated reports of security and privacy risks on a computer. The program then prompts the user to purchase a registered version of the software in order to remove the reported risks.

I hope this information is of use.

Kiero 11-17-2006, 03:42 AM

Just happened again.

krfsm 11-17-2006, 04:55 AM

And happened me this morning. Anot

Attachment KK

Home Community | Ideas IdeaStorm | Blogs Direct2Dell | Videos StudioDell | Dell Outdoors Forums | Dell.com | Support

The forum will be experiencing scheduled maintenance for a community upgrade starting Friday, October 31, 2(from 5:00pm Central Standard Time until Friday, November 7, 2008. During this time, any new content created including threads, comments, existing Private Messages and new ones created, tags and new user accounts wi not, be part of our community site on November 7th.

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Resources

Software - Virus/Spyware

Jump To a Message Board

BACK TO: Forum Home > Support > Software > Virus/Spyware > POP UP .. http://www.amaena.com/securityworm2/?aid=am2&lid=search

Reply Thread Options Message Listing Previous Thread

Jump to Page: 1 · 2 | Next Page

Reply

POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search

jeffengland
Bronze
Posts: 11
Registered: 10-14-2005

Message 1 of 15
Viewed 39,014 times

Everytime I run a search on a search engine this message pops up. I copied it and pasted it below, but I don't trust it so I won't click downloads that it suggests. This pop up window always has the above link which I posted in the message subject. I ran a virus scan scanned for blackworm and both scans said my PC was clean. How do I stop this window from constantly popping up.

You may be infected by 'Blackworm'! We recommend you DOWNLOAD
one of these security software programs to prevent further malware infections

The dangerous 'Blackworm' computer virus activated February 2006 and has started destroying data on computers it has reached. virus, which has already infected over 1,000,000 computers in several countries, continues to spread rapidly over the Internet

Attention! Security Center has detected spyware on your PC sending private information and documents to a rem computer. One of the processes (**Win32res.exe**) has just sent this information:

IP address:**72.130.11.171**Browser:**Mozilla/4.0 (compatible; MSIE 6.0; Windows NT 5.1; SV1; .NET CLR 1.0.3705; .NET 1.1.4322; Media Center PC 3.1)**Computer OS:**Windows XP**Full PC control.GainedSent Information:approximately 17 Megabytes **Latest Threats**

- Blackworm
- Blackmal
- Nyxem
- MyWife
- Kama Sutra

Your current security software is unable to stop this malicious kind of spyware/virus. To clean up your computer an prevent further risk of infection, you should download one of the following security software programs:Software namelinkfree scanusabilityperformanceadvanced featuresratingdaily

updatequality yeseasy10/10yes10/10yes97% yesvery easy10/10no10/10yes95%

02-25-2006 07:16 PM

Reply

Re: POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search [Edited]

rickmktg
Diamond
Posts: 30298
Registered: 03-03-2000

Message 2 of 15
Viewed 38,998 times

jeffengland wrote:
Everytime I run a search on a search engine this message pops up. I copied it and pasted it below, but I don't trust it so I won't click on the downloads that it suggests. This pop up window always has the above link which I posted in the message subject. I ran a virus scan and scanned for blackworm and both scans said my PC was clean. How do I stop this window fror constantly popping up.

You have spyware. Go to www.lavasoftusa.com. Download AdAware. Install it, open it, UPDATE IT, run it. Delete everything that it finds. Note - download the FREE version. Go to www.microsoft.com/athome/security/spyware/software/default.mspx. Download Windows Defender. Install it, open UPDATE IT, run it. Delete everything it finds. Start, Run, Msconfig. Click on Startup Tab. Uncheck everything that th site says you can: www.sysinfo.org/startupfist.php. When the computer reboots, check the box that says don't shov me this again. If it's X or N, uncheck it.

Message Edited by rickmktg on 02-25-2006 09:05 PM

Rick Click here for Rick's Website for personalized support. Rick's CES blog, click

CES photos, click here.

Before posting a question, try the Advanced Search on the bottom of the page as your question has probably been aske
Most commonly asked question on DellTalk - "Can I go out and buy cheap memory at a retail store, with a big rebate, and have it work in my Dell?' very, very unlikely. So save your gas or shipping and don't try to buy cheap memory! User Guides to your system, as well as Drivers and Reinstall Instructions, are under the Technical Support tab, top left of your screen. To see the systems that I run click here .

08 01 PM

Reply

Re: POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search

ky331
Platinum
Posts 8086
Registered 02-11-2001

Message 3 of 15
Viewed 38,967 times

07 48 AM

do **NOT** download neither WinAntiSpyware nor WinAntiVirus

Rather, you should try the **FixBmalE** removal tool from Symantec (assuming you can still access the Symantec WebSite.... which unfortunately, may be blocked by the malware):

instructions: http://securityresponse.symantec.com/avcenter/venc/data/w32.blackmal@mm.removal.tool.html
actual tool: http://securityresponse.symantec.com/avcenter/FixBmalE.exe

Note: If you find that the Symantec website is "blocked" on your "infected" machine, you should try to download the tool onto anothe machine (a friend's, or one at work?), then transfer it via floppy (it's a tiny file) [or memory stick, or CD-R/W] to the infected machine, then run it on the infected machine

Reply

Re: POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search

jeffengland
Bronze
Posts: 11
Registered: 10-14-2005

Message 4 of 15
Viewed 38,956 times

11 40 AM

I ran the **FixBmalE** removal tool from Symantec and it said that my computer was not infected by the blackmal. However, this anno window still keeps popping up every now and then and saying that same message. I did everything posted in the above thread as w

Reply

Re: POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search

jeffengland
Bronze
Posts: 11
Registered: 10-14-2005

Message 5 of 15
Viewed 38,956 times

11:42 AM

I did exactly what you instructed me to and this thing still pops up every now and then when I open up a new browser window. What to get rid of this thing?

Reply

Re: POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search

ky331
Platinum
Posts. 8086
Registered 02-11-2001

Message 6 of 15
Viewed 38,936 times

the suggestion to run the Symantec tool was based on your "message" indicating the presence of:
- **Blackmal**
- Nyxem
- MyWife
- Kama Sutra

all of which are synonymous, and should have been removed by the **Blackmal** tool. Since that apparently didn't work, the next ste be HiJackThis analysis:
Download a *self-extracting copy* of the latest version of HJT (HiJackThis) (version 1.99.1) from
http://downloads.malwareremoval.com/hijackthis_sfx.exe
Save it to your Desktop.
Double-click on the file **hijackthis_sfx.exe** file, and allow it to self-extract [by clicking on **UnZip**] into the suggested/default folde **C:\Program Files\HijackThis**

Use *Windows Explorer* to navigate your way into this folder, and then double click on HiJackThis.**exe**
Click on **Do a System Scan and Save a LogFile**
This will automatically open **NotePad**
Copy the entire file from NotePad: **EDIT/SelectAll, EDIT/Copy**
Then go to the new forum dedicated for HiJack This logs *(**NOT** back here)*, and **PASTE** the results there:
http://forums.us.dell.com/supportforums/board?board.id=si_hijack
Be sure to include a detailed description of any problems/errors/warnings you are encountering.
Hopefully, one of the HJT experts will get to it as quickly as possible.

WARNING: **HiJack This is a VERY POWERFUL tool. While it's *completely safe* for you to download, generate, and post y (as described above), you should *NOT* attempt to do anything else (in particular, do NOT use it to delete/fix any entries) u are advised to do so by a forum expert!! Improper use of this tool can severely damage your system.**

08 06 PM

Reply

Re: POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search

scubafrogman
Bronze
Posts 9
Registered 01-16-2005

I am having this exact same problem. I also ran the **FixBmalE** removal tool from Symantec today (3/17/06) and it said it didn't find problems. I'm also having a problem with Adult Friend Finder pop up and a message saying to remove disk when I start up my com ran Hijack this today and here is the log file.
Thanks for any help!

Message 7 of 15
Viewed 33,807 times

R1 - HKCU\Software\Microsoft\Internet Explorer\Main,Default_Page_URL = http://www.dell4me.com/myway
R0 - HKCU\Software\Microsoft\Internet Explorer\Main,Start Page = http://www.comcast.net/
R1 - HKLM\Software\Microsoft\Internet Explorer\Main,Default_Page_URL = http://www.dell4me.com/myway
R0 - HKLM\Software\Microsoft\Internet Explorer\Main,Start Page = http://www.dell4me.com/myway
O2 - BHO: AcroIEHlprObj Class - {06849E9F-C8D7-4D59-B87D-784B7D6BE0B3} - C:\Program Files\Adobe\Acrobat 7.0 \ActiveX\AcroIEHelper.dll
O2 - BHO: RawExecAction Object - {18898424-E3AB-4BA9-8E8D-5434B1CECA75} - C:\WINDOWS\system32\awvtt.dll
O2 - BHO: McBrwHelper Class - {227B8AA8-DAF2-4892-BD1D-73F568BCB24E} - c:\program files\mcafee.com\mps\mcbrhlpr.dll
O2 - BHO: McAfee PopupKiller - {3EC8255F-E043-4cae-8B3B-B191550C2A22} - c:\program files\mcafee.com\mps\popupkiller.dll
O2 - BHO: (no name) - {549B5CA7-4A86-11D7-A4DF-000874180BB3} - (no file)
O2 - BHO: MSEvents Object - {FC148228-87E1-4D00-AC06-58DCAA52A4D1} - C:\WINDOWS\system32\pmnno.dll (file missing)
O2 - BHO: (no name) - {FDD3B846-8D59-4ffb-8758-209B6AD74ACC} - (no file)
O3 - Toolbar: McAfee VirusScan - {BA52B914-B692-46c4-B683-905236F6F655} - c:\progra~1\mcafee.com\vso\mcvsshl.dll
O4 - HKLM\..\Run: [SunJavaUpdateSched] C:\Program Files\Java\j2re1.4.2_03\bin\jusched.exe
O4 - HKLM\..\Run: [MMTray] C:\Program Files\MUSICMATCH\Musicmatch Jukebox\mm_tray.exe
O4 - HKLM\..\Run: [mmtask] c:\Program Files\MusicMatch\MusicMatch Jukebox\mmtask.exe
O4 - HKLM\..\Run: [IntelMeM] C:\Program Files\Intel\Modem Event Monitor\IntelMEM.exe
O4 - HKLM\..\Run: [IAAnotif] C:\Program Files\Intel\Intel Application Accelerator\iaanotif.exe
O4 - HKLM\..\Run: [HPDJ Taskbar Utility] C:\WINDOWS\system32\spool\drivers\w32x86\3\hpztsb09.exe
O4 - HKLM\..\Run: [ehTray] C:\WINDOWS\ehome\ehtray.exe
O4 - HKLM\..\Run: [DVDLauncher] "C:\Program Files\CyberLink\PowerDVD\DVDLauncher.exe"
O4 - HKLM\..\Run: [ATIPTA] C:\Program Files\ATI Technologies\ATI Control Panel\atiptaxx.exe
O4 - HKLM\..\Run: [DIGStream] C:\Program Files\DIGStream\digstream.exe
O4 - HKLM\..\Run: [ViewMgr] C:\Program Files\Viewpoint\Viewpoint Manager\ViewMgr.exe
O4 - HKLM\..\Run: [Windows kev Messenger] mskev.exe
O4 - HKLM\..\Run: [WD Button Manager] WDBtnMgr.exe
O4 - HKLM\..\Run: [NeroFilterCheck] C:\WINDOWS\system32\NeroCheck.exe
O4 - HKLM\..\Run: [QuickTime Task] "C:\Program Files\QuickTime\qttask.exe" -atboottime
O4 - HKLM\..\Run: [MPFExe] C:\PROGRA~1\McAfee.com\PERSON~1\MpfTray.exe
O4 - HKLM\..\Run: [MCAgentExe] c:\PROGRA~1\mcafee.com\agent\mcagent.exe
O4 - HKLM\..\Run: [MCUpdateExe] C:\PROGRA~1\mcafee.com\agent\McUpdate.exe
O4 - HKLM\..\Run: [VSOCheckTask] "C:\PROGRA~1\McAfee.com\VSO\mcmnhdlr.exe" /checktask
O4 - HKLM\..\Run: [VirusScan Online] C:\Program Files\McAfee.com\VSO\mcvsshld.exe
O4 - HKLM\..\Run: [OASCInt] C:\Program Files\McAfee.com\VSO\oascInt.exe
O4 - HKLM\..\Run: [MPSExe] c:\PROGRA~1\mcafee.com\mps\mscifapp.exe /embedding
O4 - HKLM\..\Run: [KernelFaultCheck] %systemroot%\system32\dumprep 0 -k
O4 - HKLM\..\RunServices: [Windows kev Messenger] mskev.exe
O4 - HKCU\..\Run: [MSMSGS] "C:\Program Files\Messenger\msmsgs.exe" /background
O4 - HKCU\..\Run: [Windows kev Messenger] mskev.exe
O4 - HKCU\..\Run: [DellSupport] "C:\Program Files\Dell Support\DSAgnt.exe" /startup
O4 - HKCU\..\RunServices: [Windows kev Messenger] mskev.exe
O4 - Startup: PowerReg Scheduler V3.exe
O4 - Global Startup: Adobe Gamma Loader.lnk = ?
O4 - Global Startup: Adobe Reader Speed Launch.lnk = C:\Program Files\Adobe\Acrobat 7.0\Reader\reader_sl.exe
O4 - Global Startup: D-Link AirPlus G Configuration Utility.lnk = ?
O4 - Global Startup: Logitech Desktop Messenger.lnk = C:\Program Files\Logitech\Desktop Messenger\8876480\Program\LDMCon
O4 - Global Startup: Microsoft Office.lnk = C:\Program Files\Microsoft Office\Office\OSA9.EXE
O4 - Global Startup: Microsoft Works Calendar Reminders.lnk = ?
O9 - Extra button: (no name) - {08B0E5C0-4FCB-11CF-AAA5-00401C608501} - C:\WINDOWS\system32\msjava.dll
O9 - Extra 'Tools' menuitem: Sun Java Console - {08B0E5C0-4FCB-11CF-AAA5-00401C608501} - C:\WINDOWS\system32\msjava
O9 - Extra button: Real.com - {CD67F990-D8E9-11d2-98FE-00C0F0318AFE} - C:\WINDOWS\system32\Shdocvw.dll
O9 - Extra button: Messenger - {FB5F1910-F110-11d2-BB9E-00C04F795683} - C:\Program Files\Messenger\msmsgs.exe
O9 - Extra 'Tools' menuitem: Windows Messenger - {FB5F1910-F110-11d2-BB9E-00C04F795683} - C:\Program Files\Messenger\msmsgs.exe
O16 - DPF: {11260943-421B-11D0-8EAC-0000C07D88CF} (iPIX ActiveX Control) - http://www.ipix.com/viewers/ipixx.cab
O16 - DPF: {4ED9DDF0-7479-4BBE-9335-5A1EDB1D8A21} (McAfee.com Operating System Class) - http://download.mcafee.com/molbin/shared/mcinsctl/4,0,0,101/mcinsctl.cab
O16 - DPF: {BCC0FF27-31D9-4614-A68E-C18E1ADA4389} (DwnldGroupMgr Class) - http://download.mcafee.com/molbin/shared/mcgdmgr/1,0,0,26/mcgdmgr.cab
O16 - DPF: {CE28D5D2-60CF-4C7D-9FE8-0F47A3308078} (ActiveDataInfo Class) - http://www.symantec.com/techsupp/asa/SymA
O20 - Winlogon Notify: awvtt - C:\WINDOWS\system32\awvtt.dll
O20 - Winlogon Notify: pmnno - C:\WINDOWS\system32\pmnno.dll (file missing)
O23 - Service: Ati HotKey Poller - Unknown owner - C:\WINDOWS\system32\Ati2evxx.exe
O23 - Service: Creative Service for CDROM Access - Creative Technology Ltd - C:\WINDOWS\system32\CTSvcCDA.EXE
O23 - Service: IAA Event Monitor (IAANTMon) - Intel Corporation - C:\Program Files\Intel\Intel Application Accelerator\iaantmon.exe
O23 - Service: InstallDriver Table Manager (IDriverT) - Macrovision Corporation - C:\Program Files\Common Files\InstallShield\Driv \Intel 32\IDriverT.exe
O23 - Service: LightScribeService Direct Disc Labeling Service (LightScribeService) - Hewlett-Packard Company - C:\Program Files\Common Files\LightScribe\LSSrvc.exe
O23 - Service: McAfee WSC Integration (McDetect.exe) - McAfee, Inc - c:\program files\mcafee.com\agent\mcdetect.exe
O23 - Service: McAfee.com McShield (McShield) - McAfee Inc. - c:\PROGRA~1\mcafee.com\vso\mcshield.exe
O23 - Service: McAfee Task Scheduler (McTskshd.exe) - McAfee, Inc - c:\PROGRA~1\mcafee.com\agent\mctskshd.exe
O23 - Service: McAfee SecurityCenter Update Manager (mcupdmgr.exe) - McAfee, Inc - C:\PROGRA~1\McAfee.com\Agent\mcupdi
O23 - Service: McAfee Personal Firewall Service (MpfService) - McAfee Corporation - C:\PROGRA~1\McAfee.com\PERSON~1 \MpfService.exe
O23 - Service: Retrospect Launcher (RetroLauncher) - Dantz Development Corporation - C:\PROGRA~1\Dantz\RETROS~1\retrorui
O23 - Service: Retrospect Helper - Dantz Development Corporation - C:\PROGRA~1\Dantz\RETROS~1\rthlpsvc.exe
O23 - Service: Retrospect WD Service (RetroWDSvc) - Dantz Development Corporation - C:\PROGRA~1\Dantz\RETROS~1\wdsvc

03-17-2008, 08:00 PM

Reply

Re: POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search

ky331
Platinum
Posts: 8086
Registered: 02-11-2001

Scuba,

we've had a lot more experience with Amaena now. and especially, since you've included your HJT log. .

please download and run Atribune's VundoFix, per directions here: http://forums.us.dell.com/supportforums/board/message?board.id=si_hijack&message.id=29584

then, update your java (directions in same link) from j2re1 4.2_03 to 1.5.0_06

REPLY here, and let me know if this fixes your problem.

Message 8 of 15
Viewed 33,768 times

09-17-2007 09:21 PM

Reply

Re: POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search

scubafrogman
Bronze
Posts: 9
Registered: 01-16-2005

Message 9 of 15
Viewed 33,765 times

03-17-2006 09:29 PM

Yep, I found that link right after I posted my message. I followed the directions and so far so good. No pop ups from Amaena
Thank You!

Reply

Re: POP UP ....http://www.amaena.com/securityworm2/?aid=am2&lid=search

GotVirus
Newbie
Posts: 1
Registered: 03-20-2006

Message 10 of 15
Viewed 32,785 times

03-25-2006 04:52 PM

Just thought I'd let you all know, I tried EVERYTHING above, and none of it worked. However, after doing all of that, I found anothe
which recommended "Spyware Doctor" which has a built in Malware remover. I had to pay for it, but it worked 100%, and got rid of
of other Bugs that were hidden on my computer that I wasn't aware of, even though I run Ad-aware regularly.
I highly recommend Spyware Doctor. Since you have to pay for it, you also get a real time monitoring system which blocks things lik
from happening in the future. Irregardless if you use it for all its features, it got Rid of the "Amaena.com" / WinAntiVirus / WinSpyWa
up issue.

TOP TAGS

No tags yet

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Attachment KK

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Microsoft
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WinAntiVirus 2006 & WinAntiSpyware 2006 Pop-ups in Security

Search For: In: Security Go

Susand 4/17/2007 9:41 AM PST

Question

Tried everything, even Oefender. Running Norton 2007 Internet Security (automatic updates on start-up)

Frequency has deminished but printed most of the screen shots. Most of the pop up comes from a site run by
www.amaena.com/securityworm(5)(81)(666)/.....
Others, which I think is link ups, //em.pc-on-internet.com/eas &
www.errorprotector.com/free/.....

At wits end. What next. Think this started with a program attachment from Starware Inc & linked to Kontiki Inc.

Please help

Was this post helpful to you? Yes No Reply Top

tallhat 6/23/2007 7:50 PM PST

"Susand" wrote:

Click to show or hide original message or reply text.

Was this post helpful to you? Yes No Reply Top

Rissa 7/24/2007 6:11 AM PST

I am having the same problem. Does anyone have a solution? Rissa

"tallhat" wrote:

Click to show or hide original message or reply text.

Was this post helpful to you? Yes No Reply Top

tallhat 6/23/2007 8:06 PM PST

"Susand" wrote:

Click to show or hide original message or reply text.

Was this post helpful to you? Yes No Reply Top

Susand 6/24/2007 6:58 AM PST

Found the resolution to this problem by disabling my Norton Internet Security/Anti Virus & firewall and running removal tool on Kaspersky website. Suggest visit Kaspersky website and search for related items (they update on regular basis) run the removal tool and install latest free trail of Security/Anti Virus from this site.

"Susand" wrote:

Click to show or hide original message or reply text.

Was this post helpful to you? Yes No Reply Top

Syah 10/18/2007 9:22 AM PST

hi susand...
I also been attacked by this culprit and I do found the solution to overcome this matter... It is very easy and simple... just download spyterminator from site www.spyterminator.com and it really work and it cleaned it very well.

"Susand" wrote:

Click to show or hide original message or reply text.

Was this post helpful to you? Yes No Reply Top

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WindowsKB

Windows Forum / Windows XP / **General Topics 2** / June 2006

Tip: Looking for answers? Try searching our database.
amaena security worm Search

Security worm

Thread view: Tree View Enable EMail Alerts Start New Thread

Thread rating:

Terry - 16 Jun 2006 07:39 GMT

I have a amaena.com/security worm58. It pops open many windows directing me to a site for Win Antivirus Pro and Win Antispyware. My Norton, Spybot, or Adware SE, programs won't get rid of it. Is there any simple way I can get rid of it. I tried manually typing it in my Norton Blocked antispam list but this didn't do it neither.

Reply to this Message

Byte - 16 Jun 2006 16:52 GMT

Top Amaena Popup Spyware Remover Reviews
http://winfixerremovers.org/Amaena.html?gclid=CJuRltWVy4UCFQFfHgodfx152A
Signature

> *I have a amaena.com/security worm58. It pops open many windows directing me to a site for Win Antivirus Pro and Win Antispyware. My Norton, Spybot, or Adware SE, programs won't get rid of it. Is there any simple way I can get rid of it. I tried manually typing it in my Norton Blocked antispam list but this didn't do it neither.*

Reply to this Message

rosed1 - 16 Jun 2006 22:29 GMT

bitdefender.com/scan8/ie.html [bitdefender.com]
kaspersky.com/kos/english/kavwebscan.html [kaspersky.com]
housecall65.trendmicro.com [trendmicro.com]
pandasoftware.com/activescan [pandasoftware.com]
avast.com/eng/down_cleaner.html [avast.com] (((((They are online virus removers Try a couple one of em should remove it! :)

Reply to this Message

Find more on: amaena security worm

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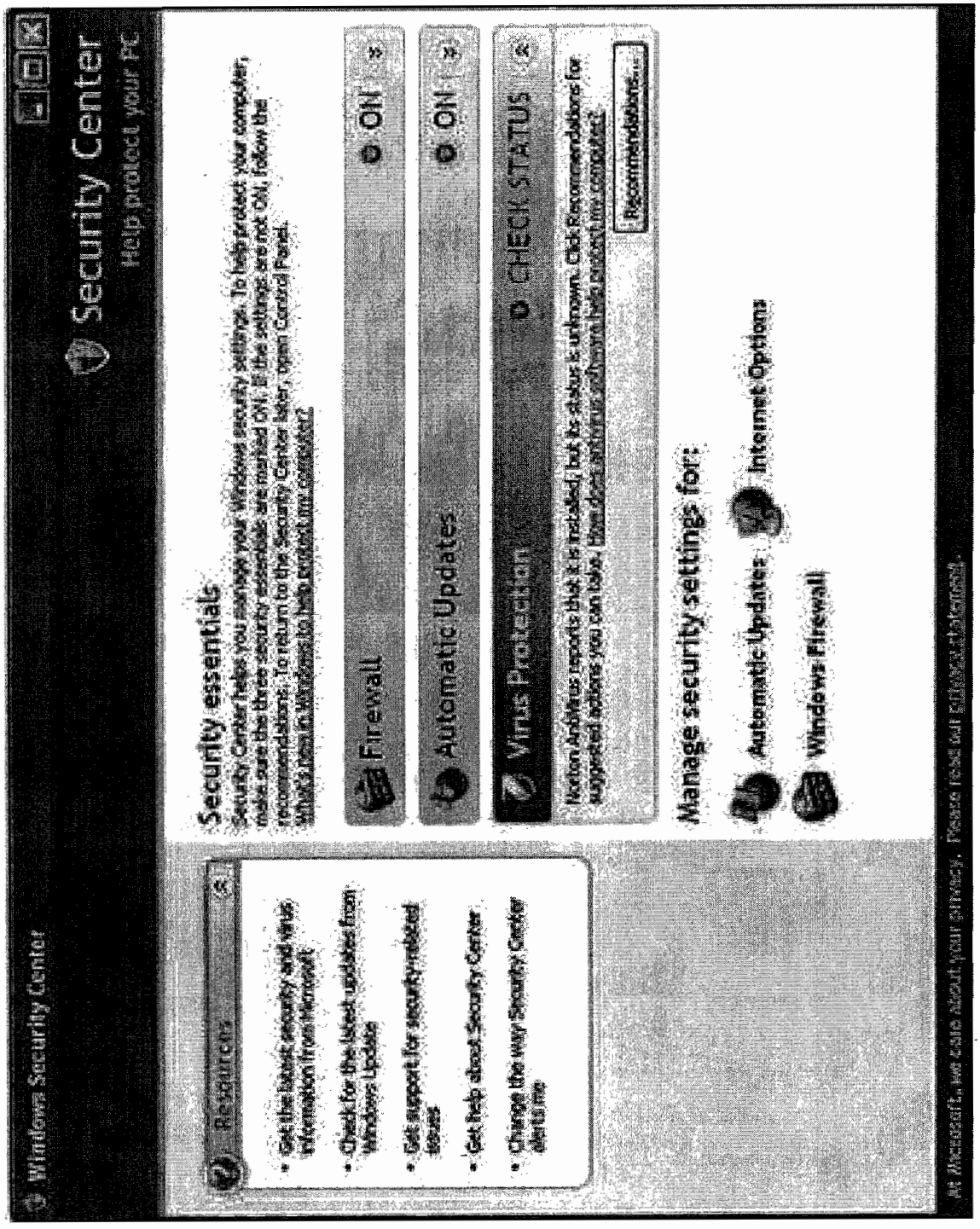
Attachment LL

Attachment MM



Attachment NN

Sign in | Help

Spyware Sucks

Real heroes are men who fall and fail and are flawed, but win out in the end because they've stayed true to their ideals and beliefs and commitments - Kevin Costner

Winfixer and ValueClick – an oft appearing association

My regular readers will remember my various articles about the Winfixer infiltration of the AOL and MSN advertising networks that happened not long ago. Winfixer infiltration of Web site advertising (as well as forum and comment spam) continues to be problematic, and one name that keeps on popping up over and over again is **adfarm.mediaplex.com** (Mediaplex is owned by ValueClick). The problem seems to be so endemic that any web site, forum or Web comment that utilises links that redirect to **adfarm.mediaplex.com** are potentially placing their visitors at risk of a Winfixer infection.

Over the past couple of months I have had in-person and telephone conferences with representatives and technical staff at MSN and AOL as a direct result of the Winfixer infilitrations of various advertising networks. They have learned a lot from the events of the past few months, as have I. I don't think any of us realised how widespread the problem was, or just how sophisticated the bad guys were getting, until we started taking a close look.

Mike Burgess and I have been having a close look at **adfarm.mediaplex.com**. I have tried to contact ValueClick regarding the **adfarm.mediaplex.com** problems using their "contact us" page on their Web site, but as of yet have received no response (and those of you that know me well know that a failure to respond is sure to intensify the attention that I pay to a problem advertisement network). I will be contacting them directly via an email address given to me by an associate as soon as this article goes live, and will report on their responses, if any.

Edit 26 April: There has been no response from ValueClick

Edit 27 April: ValueClick have responded to advise they are investigating

Edit 8 May: ValueClick report that they are still investigating

Why is Winfixer bad?

The Winfixer group of products is listed as a "Rogue Security Product" in the latest Microsoft Security Response Report. The Microsoft Security Intelligence Report can be downloaded here: http://download.microsoft.com/download/f/d/a/fda5850e-269f-40a3-9708-c60eb837456f/MS_Security_Report_Jul-Dec06.pdf

Microsoft's definition of "Rogue Security Products" is:

"These products appear under a variety of names and produce a variety of results for the end user, ranging from limited or no detection capability, coupled with a fraudulent request to pay for a "full" version, to outright malicious behavior, such as installing malicious software without the user's consent in order to give the product something to detect. In many cases, the people behind such software would attempt to get the infected individual to pay them for removal of purported infections using fraud and social engineering."

A worrying statistic from the Rogue Security Products table that specifically mentions Winfixer products is that 55% of users who have WinSoftware.WinAntiVirus installed, and 31.3% of users

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who have WinSoftware.WinAntiSpyware installed chose to *ignore* the detection, with only 30.6% and 37.6% respectively choosing to remove the software. I can only assume that the victims of these products are choosing to believe that the various Winfixer offerings are legitimate products instead of heeding the warning being given by Windows Defender.

In contrast, 75.7% of Windows Defender users choose to remove the "potentially unwanted software" C2.LOP (aka C2Media, aka Circle Distribution, and the software commonly known as the Messenger Plus! Sponsor Program).

Now, all of us are entitled to earn an income, all of us are entitled to advertise, and companies such as Mediaplex and ValueClick are entitled to offer a service to advertisers. BUT, I believe that a line is crossed when deceit is practiced – when the advertisers that Mediaplex and ValueClick are "enabling" via their services try to automatically download and install their product on to your system (thank heaven for IE's info bar that stops such things from happening automatically), when an advertisement tries to trick you into thinking that your computer system is having issues or that your privacy is at risk, or when the software being touted falsely reports infections where none exists – companies such as ValueClick and Mediaplex should run, screaming, from such clients. Slowly but surely I'm seeing a move towards forcing advertisers, and those who use their services, to ensure that those they associate and do business with are ethical and above board, as distinct to just making sure that their own actions are ok. In short, saying "but it wasn't me" and "but I didn't know" isn't the end-of-responsibility argument that it used to be.

Winfixer prevalance

Just how pervasive is the spamming, pimping and touting of Winfixer domains? How many adverts are out there pushing people to such sites, and how many potential infectees are there? Well, let's have a look at the Alexa Traffic Ranking of various Winfixer sites:

Drivecleaner.com:
http://www.alexa.com/data/details/traffic_details?url=www.drivecleaner.com
(rank 587) (570 on 26 April)

Systemdoctor.com:
http://www.alexa.com/data/details/traffic_details?url=www.systemdoctor.com
(ranking 966) (929 on 26 April)

Errorsafe:
http://www.alexa.com/data/details/traffic_details?url=www.errorsafe.com
(ranking 1,001) (990 on 26 April)

Winantivirus:
http://www.alexa.com/data/details/traffic_details?url=www.winantivirus.com
(ranking 1,630) (1,574 on 26 April)

Winantispyware:
http://www.alexa.com/data/details/traffic_details?url=www.winantispyware.com
(rank 4,793) (4,539 on 26 April)

Errorprotector.com:
http://www.alexa.com/data/details/traffic_details?url=www.errorprotector.com
(ranking 7,636) (6,966 on 26 April)

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Gomyron.com:
http://www.alexa.com/data/details/traffic_details?url=www.gomyron.com
(ranking 214,212) (197,535 on 26 April)

By way of comparison with legitimate security products, mcafee.com has a ranking of 932 (954 on 26 April), symantec.com has a ranking of 218 (222 on 26 April), ca.com has a ranking of 3,148 (3,262 on 26 April) and trendmicro.com has a ranking of 2,335 (2,361 on 26 April).

How is ValueClick involved in the spread of Winfixer?

ValueClick owns Mediaplex, and Mediaplex is an oft-spotted contributor to the spread of Winfixer malware.

Just some **adfarm.mediaplex.com** URLs that redirect to Winfixer and Winfixer like sites include:

hxxp://go.errorsafe.com/MTUwNzE=/2/5590/ax=1/ed=1/ex=1/555/
redirects to:
hxxp://**adfarm.mediaplex.com**/ad/ck/45684?
mpt=1177402585&aid=swp_ers&lid=5590&affid=pp_841427153&p=ers&ax=1&ed=1&ex=1

hxxp://go.winantivirus.com/NTIzMw==/2/3224/ax=1/ex=1//
redirects to:
hxxp://**adfarm.mediaplex.com**/ad/ck/45678?
mpt=1177404112&aid=swp_wa7p&lid=3224&affid=pp_2131627152&ax=1&ex=1

hxxp://go.winantispyware.com/MTUwNjU=/2/5590/ax=1/ed=1/ex=1/555/
redirects to:
hxxp://**adfarm.mediaplex.com**/ad/ck/45682?
mpt=1177473791&aid=swp_was7&lid=5590&affid=pp_117727353&p=was&ax=1&ed=1&ex=1

hxxp://go.winantispyware.com/NTY2Mg==/2/3345/ax=1/ed=1/ex=1/af6/
redirects to:
hxxp://**adfarm.mediaplex.com**/ad/ck/45682?
mpt=1177485361&aid=swp_was7&lid=3345&affid=pp_669127382&p=was&ed=1&ex=1

hxxp://go.privacyprotector.com/MTUwNjc=/2/5590/ax=1/ed=1/ex=1/555/
redirects to:
hxxp://**adfarm.mediaplex.com**/ad/ck/49988?
mpt=1177473894&aid=swp_pp&lid=5590&affid=pp_181027351&ax=1&ed=1&ex=1

hxxp://go.winantivirus.com/MTUwNjg=/2/5590/ax=1/ed=1/ex=1/555/
redirects to:
hxxp://**adfarm.mediaplex.com**/ad/ck/45678?
mpt=1177474037&aid=swp_wa7p&lid=5590&affid=pp_271427354&ax=1&ed=1&ex=1

hxxp://go.drivecleaner.com/MTUwNjk=/2/5590/ax=1/ed=1/ex=1/555/
redirects to:
hxxp://**adfarm.mediaplex.com**/ad/ck/45688?
mpt=1177474361&aid=swp_dc&lid=5590&affid=pp_469727351&ax=1&ed=1&ex=1

hxxp://go.errorprotector.com/MTUwNzA=/2/5590/ctx=1/in=1/epp=1/555/
redirects to:

hxxp://**adfarm.mediaplex.com**/ad/ck/49487?
mpt=1177474589&aid=swp_erp&lid=5590&affid=pp_619327354&ctx=1&in=1&epp=1

hxxp://go.systemdoctor.com/MTUwNzI=/2/5590/ax=1/ed=1/ex=1/555/
redirects to:
hxxp://**adfarm.mediaplex.com**/ad/ck/45686?
mpt=1177474773&aid=swp_sdr&lid=5590&affid=pp_737127354&ax=1&ed=1&ex=1

hxxp://gomyron.com/MTUwNzM=/2/5590/555/
redirects to:
hxxp://**adfarm.mediaplex.com**/ad/ck/7412-39608-16292-6?
mpt=1177475141&aid=swp_ron&lid=5590&affid=pp_944227352&

Mike Burgess writes about hard-core adult sites with images of underage boys that use **adfarm.mediaplex.com** content
http://msmvps.com/blogs/hostsnews/archive/2007/04/22/more-on-Winfixer-and-valueclick.aspx

He also writes about false claims of TRUSTe certification (again with **adfarm.mediaplex.com** content)
hxxps://secure.drivecleaner.com/payment/?ad=keyin&link=keyin&site=169&product=452&aff=

<body onload="setSelected()">
<IMG SRC="hxxps://**adfarm.mediaplex.com**/ad/bk/7412-39614-2054-1?Get=1&mpuid="
BORDER=0 HEIGHT=1 WIDTH=1>
<IMG SRC="hxxps://**adfarm.mediaplex.com**/ad/bk/7390-42400-2054-1?1-
PaypageEntrance=1&mpuid=" BORDER=0 HEIGHT=1 WIDTH=1>

The above is the same exact code as is displayed here:
http://msmvps.com/blogs/hostsnews/archive/2007/04/23/Winfixer-and-valueclick-in-the-uk.aspx

Then there is this report by Mike:
http://msmvps.com/blogs/hostsnews/archive/2007/04/20/are-advertisers-promoting-malware.aspx

And this:
http://msmvps.com/blogs/hostsnews/archive/2007/04/21/more-on-Winfixer.aspx

My sincere hope is that Mediaplex and ValueClick come to the attention of the FTC, and that the FTC takes action, if Mediaplex and ValueClick to not take comprehensive action to clean up their service and make sure that the problems discussed here do not recur in the future.

Do ValueClick enforce their antispam policy?

ValueClick says:

"It is our policy to prohibit the sending of unsolicited or "Spam" e-mail by ValueClick or any of its marketing partners." (cite: http://www.valueclick.com/privacy.html)

Hundreds of spam messages have been posted on various forums in contravention of the above policy:

http://www.google.com/search?q=drivecleaner.com&hl=en&safe=off&start=40&sa=N
http://www.google.com/search?q=go.sexprofit.com&hl=en&safe=off&start=10&sa=N

A typical spam post can be found here:
http://www.splinecage.com/forums/archive/index.php/t-1550.html

Every single one of the links in that forum post route thru **adfarm.mediaplex.com.**

My own blog is being hit by hundreds of spam comments every week – in fact, I have **2095** comments awaiting my attention right at this very moment, all of which are marked as spam, and 99% of which are submitted by a very prolific "author" under the pseudonym "..." (yes, I know, the author is a bot – I'm being facetious).

Anyway, all of the comments submitted by author "..." have a myriad different URLs as the author's Web site, virtually all of which redirect to Winfixer sites via **adfarm.mediaplex.com**. Yes, I could list all of the URLs that I am seeing in my blog comments, and provide definitive proof of **adfarm.mediaplex.com** involvement, but I think this article will prove beyond a doubt that there is big problem at **Mediaplex** even without those specifics.

To give you an idea of just how endemic the problem of **adfarm.mediaplex.com** being used as a conduit for winfixer malware is, check out the list of **adfarm.mediaplex.com** URLs below, all of which redirect to Winfixer, Winfixer related or Winfixer type sites at the time of testing. I noticed as I was working my way through the various **adfarm.mediaplex.com** URLs by changing (for example) 45678 to 45679 then 45680 and so on and so forth, that I was hitting very few "legitimate" Web sites using this test routine, which is very worrying and makes me wonder just how widespread the Winfixer infiltration is at ValueClick. I suspect that if I kept checking, and testing, that I could continue to add to that list, but let's be honest, I'm already at the stage where I am thinking "enough already - I get it - there's a big problem here".

I have already tried the "Contact Us" facility at
http://www.valueclick.com/about/contact.html and received NO RESPONSE - not even an acknowledgement that my approach had been received, despite my including this URL - hell, if potential underage porn doesn't get their attention, what the hell will???
http://msmvps.com/blogs/spywaresucks/archive/2007/04/22/857830.aspx

It will be very interesting to see what reaction, if any, we get from Mediaplex and ValueClick when they see this article. You see, they need to do more than get rid of the rogue content that is already there; they have to stop future occurrences and reassure everybody who uses their content that Mediaplex and ValueClick can be trusted to stay clean going forward, but here is the kicker... will they want to, especially if Winfixer and Winfixer type clients are a major part of any sector of their income stream?

hxxp://adfarm.mediaplex.com/ad/ck/45678
hxxp://adfarm.mediaplex.com/ad/ck/45682
hxxp://adfarm.mediaplex.com/ad/ck/45684
hxxp://adfarm.mediaplex.com/ad/ck/45686
hxxp://adfarm.mediaplex.com/ad/ck/45688
hxxp://adfarm.mediaplex.com/ad/ck/49487
hxxp://adfarm.mediaplex.com/ad/ck/49686
hxxp://adfarm.mediaplex.com/ad/ck/49688
hxxp://adfarm.mediaplex.com/ad/ck/49690
hxxp://adfarm.mediaplex.com/ad/ck/49694

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hxxp://adfarm.mediaplex.com/ad/ck/49696
hxxp://adfarm.mediaplex.com/ad/ck/49698
hxxp://adfarm.mediaplex.com/ad/ck/49700
hxxp://adfarm.mediaplex.com/ad/ck/49702
hxxp://adfarm.mediaplex.com/ad/ck/49704
hxxp://adfarm.mediaplex.com/ad/ck/49706
hxxp://adfarm.mediaplex.com/ad/ck/49708
hxxp://adfarm.mediaplex.com/ad/ck/49710
hxxp://adfarm.mediaplex.com/ad/ck/49712
hxxp://adfarm.mediaplex.com/ad/ck/49714
hxxp://adfarm.mediaplex.com/ad/ck/49717
hxxp://adfarm.mediaplex.com/ad/ck/49719
hxxp://adfarm.mediaplex.com/ad/ck/49720
hxxp://adfarm.mediaplex.com/ad/ck/49725
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hxxp://adfarm.mediaplex.com/ad/ck/49793
hxxp://adfarm.mediaplex.com/ad/ck/49795
hxxp://adfarm.mediaplex.com/ad/ck/49799
hxxp://adfarm.mediaplex.com/ad/ck/49806
hxxp://adfarm.mediaplex.com/ad/ck/49811
hxxp://adfarm.mediaplex.com/ad/ck/49816
hxxp://adfarm.mediaplex.com/ad/ck/49827
hxxp://adfarm.mediaplex.com/ad/ck/49831
hxxp://adfarm.mediaplex.com/ad/ck/49836
hxxp://adfarm.mediaplex.com/ad/ck/49837
hxxp://adfarm.mediaplex.com/ad/ck/49988

Published Wednesday, April 25, 2007 11:25 PM by sandi

Comments

 # re: Winfixer and ValueClick – an oft appearing association

Sandi, That's a brilliant breakdown of one of the worst offenders out there today. It's common knowledge that you shouldn't click/download/view documents/accept invitations etc from strangers, but some of the tricks these people use are just below the belt at times. Thanks for the tips and info on Winfixer....

Wednesday, April 25, 2007 10:07 AM by Brian Madsen

 # re: Winfixer and ValueClick – an oft appearing association

Excellent work Sandi. As some of you probably know, I'm an attorney representing a

Attachment OO

plaintiff in San Jose, CA whose computer WinFixer recently trashed. It's our goal to stop WinFixer at its source, and permanently.

You can learn more about my work here:

http://www.youtube.com/watch?v=zBUZHiKhsog

And here:

http://www.computerworld.com/action/article.do?command=viewArticleBasic&articleId=9012579

Anyone who has been affected by these Mediaplex ads, please feel free to contact me at (650) 575-6590, or by emailing counsel@fixwinfixer.com. Best wishes, Joseph

Wednesday, April 25, 2007 12:18 PM by Joseph Bochner
 # re: Winfixer and ValueClick – an oft appearing association

Great work Sandi - but when will they pay you to protect the world? Seriously - how much of this stuff do the vendors and the community expect for free? How much have MS or AOL paid you to continue the fight? I know - NOTHING - NADA - ZIP. You do this out of the goodness of your heart which I know well. Surely - if they really thought it was a worthy cause they would have gotten the problem solved by now! Don't get me wrong - I'm not criticising your work at all - but when will the big guys step up to the plate and take a swing at solving this. You do this out of your best intentions and for free. You should be being paid as a security consultant by MS or AOL given you've saved countless millions from being infected by this crap. Now you've got attorneys reading your blog and potentially using it in court - they get paid - what about you? Keep up the good work Sandi - but hopefully someone from MS or AOL will think about contributing to keeping food on Sandi's table :-) Wayne

Wednesday, April 25, 2007 5:51 PM by Wayne Small
 # re: Winfixer and ValueClick – an oft appearing association

Kick ass article Sandy. I'm going to spread it around. Just the other day I couldn't convince someone that ValueClick did deserve to be included in a data base for blocking. This should do it!

Wednesday, April 25, 2007 7:04 PM by JeanInMontana
 # re: Winfixer and ValueClick – an oft appearing association

NICE JOB. Glad to see someone is out there helping with this crap. I really liked that you posted details and numbers!

Saturday, April 28, 2007 12:54 PM by coz
 # Valueclick and Winfixer... the association continues

Mike Burgess reports that ValueClick is not cleaning up their act:
msmvps.com/.../hostsnews

Sunday, May 06, 2007 8:11 AM by Spyware Sucks
 # 1. ValueClick and malware - the problem continues 2. The FTC investigates ValueClick

ValueClick seems to be facilitating more than the distribution of malware like Winfixer. Check out Mike's

Saturday, May 19, 2007 12:42 AM by Spyware Sucks
 # re: Winfixer and ValueClick – an oft appearing association

This article is so very informational. Just yesterday, i happened to get onto an adult dating site and my laptop got hit by spyware, took control over my IE and then all I know is that the names listed in this article - gomyron.com, go.errorprotector.com,

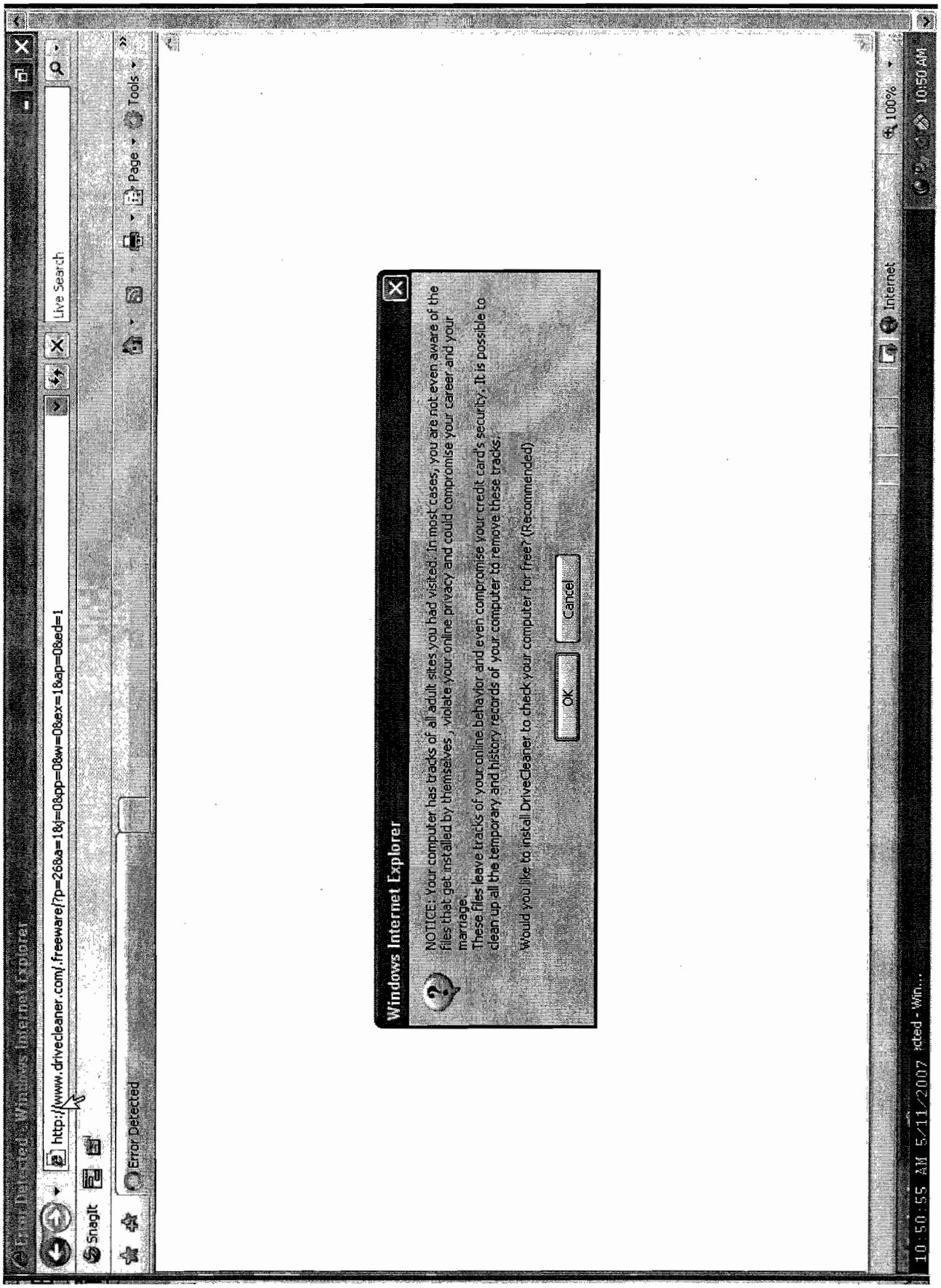
Attachment OO

go.privacyprotector.com just started repeatedly popping up on my system and I could'nt do a thing about it. My IE was totally gone and I started getting warning and alarming messages continuosly that I have my system has been hit with viruses. The techs had a hard time getting it off the system

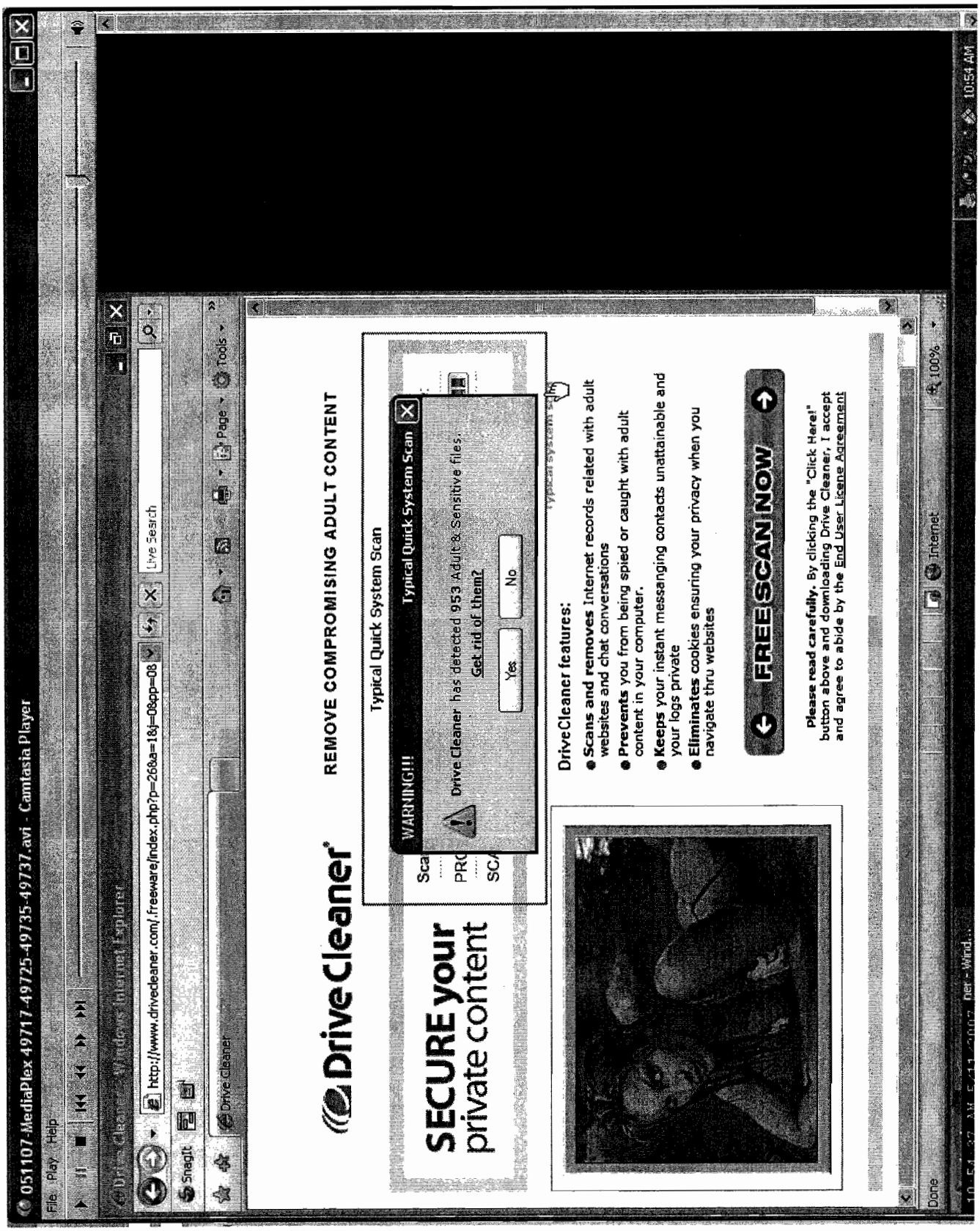
I hope this article really is a step forward for someone to take action against valueclick and mediaplex. They sure can make your life miserable

Friday, June 22, 2007 2:55 PM by Jenny

Copyright © is the original authors. Blog site is an independent site not sponsored by Microsoft. The Yoda blog server and the Brianna SQL server would like to thank www.ownwebnow.com and www.exchangedefender.com. They wouldn't be here and broadcasting without the generosity of Vlad Mazek and his companies.

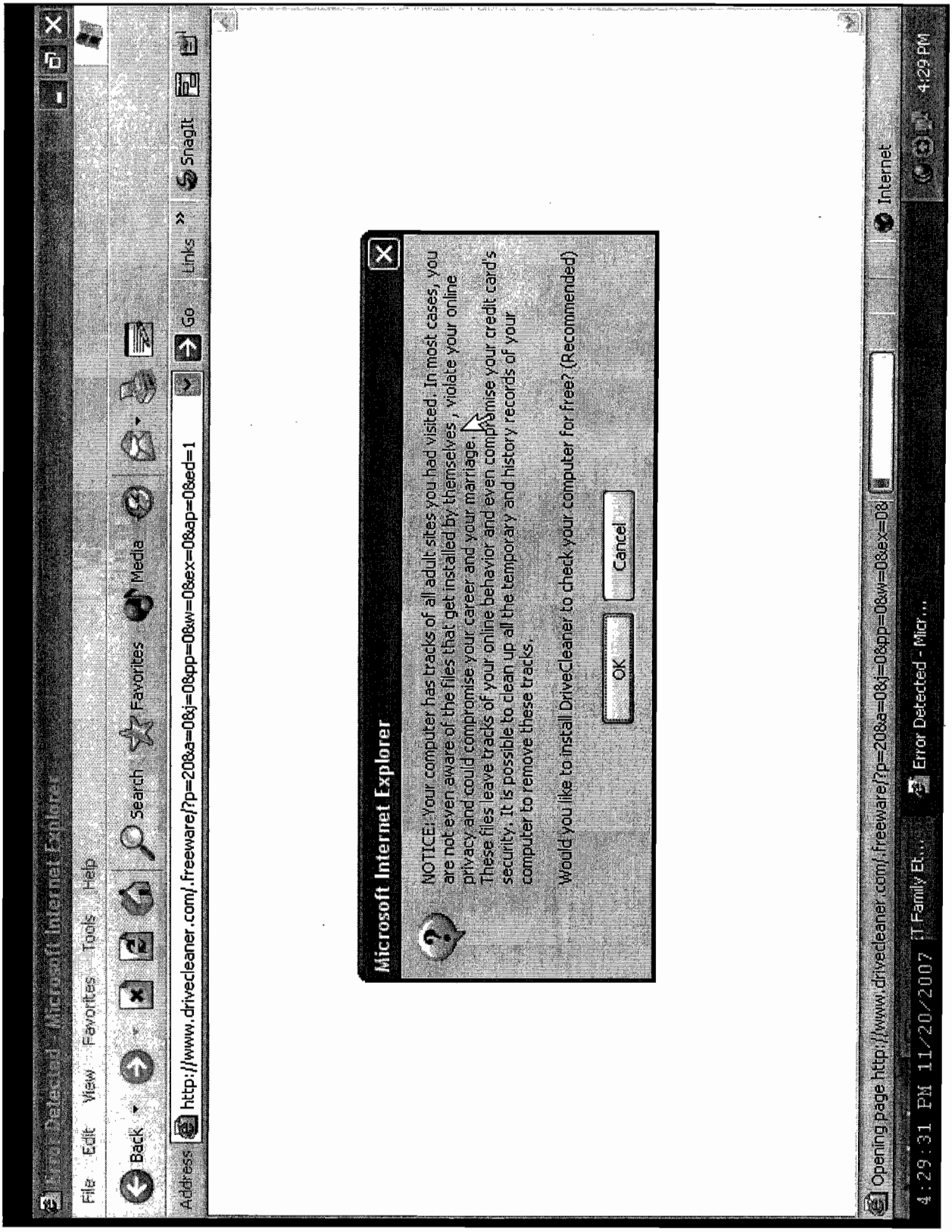


Attachment PP



Attachment QQ

4:34:54 PM 11/20/2007

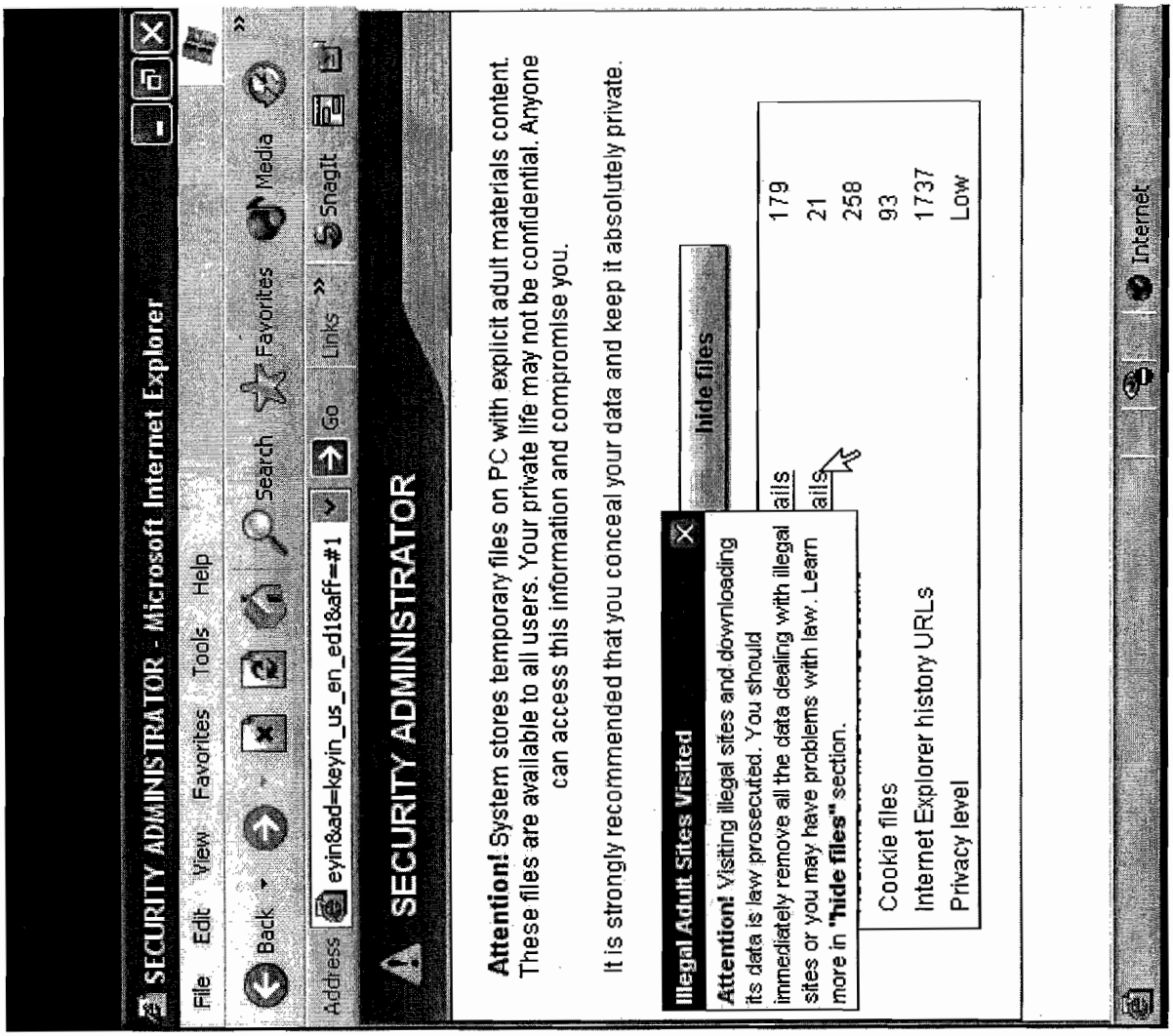


Attachment RR

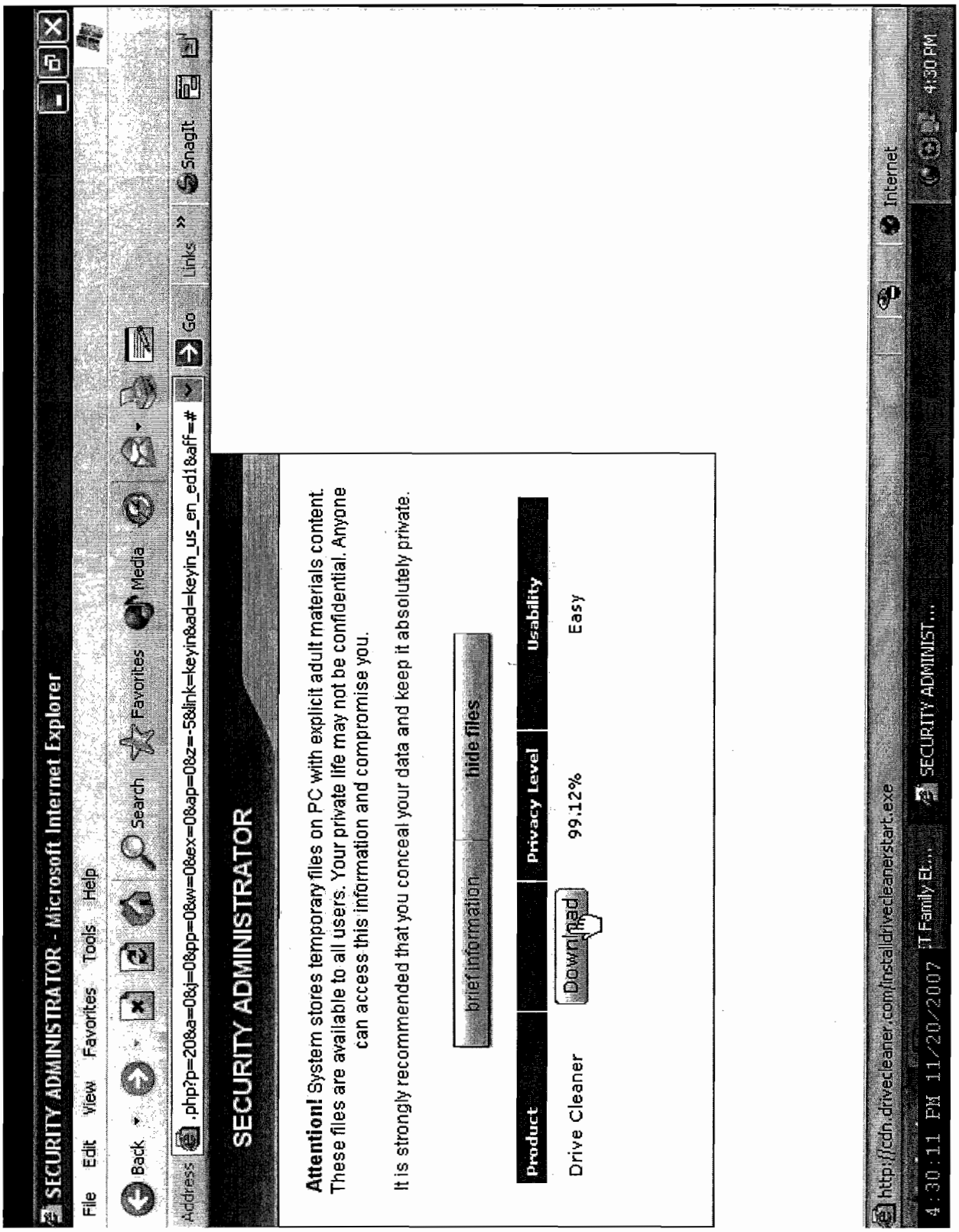
4:35:55 PM 11/20/2007

Attachment RR

4:36:19 PM 11/20/2007



4:36:40 PM 11/20/2007



Attachment RR

NOTE: Software updates currently taking place; please excuse any errors.

Top Download

Recommended & Rated 5 Cows by Tucows (Feb 2008)

Clean, repair and optimize your system with the industry leading and award-winning **RegistryBooster 2009.**

Download Now

Click to Download Now

drivecleaner.com/.freeware.. HORRIBLE POP UPS

Vote

5 days 6 hrs 14 min 52 sec

Time is running out!

Tech Support Guy encourages all U.S. citizens to vote on Tuesday. **Click here for helpful links.**

HELLO AND WELCOME! Before you can post your question, you'll have to register -- it's completely free! Click here to join today! We highly recommend that you print a copy of our Guide for New Members. Enjoy!

Malware Removal & HijackThis Logs

- autorun.vbs not found
- Web Developer: help my CPU runs at 100% have anti vir scanned - no virus!
- trojan-downloader.win32.agent variant
- completetala - hehehehehehehh!!!!
- Test
- Infected with Outerinfo and others...
- spyware forcing me off tech support site.
- Computer is messed up please look at hijack log attached
- Version of AntiVirus 2008, Internet Connection Blocked
- nvcpldaemon - friend or foe
- Dns 85.255.112.174
- laptop infected: hacktool.rootkit
- help!virus response lab 2009 trojan.zlob
- Someone help me with this hijack this log!
- Please check for keylogger(s)!

Thread Tools

Click Here to Run a Free Registry Scan [Sponsored Link]

RP69FUN
Junior Member with 6 posts.

Join Date: Jun 2007
Experience: Intermediate

27-Jun-2007, 09:16 PM #1

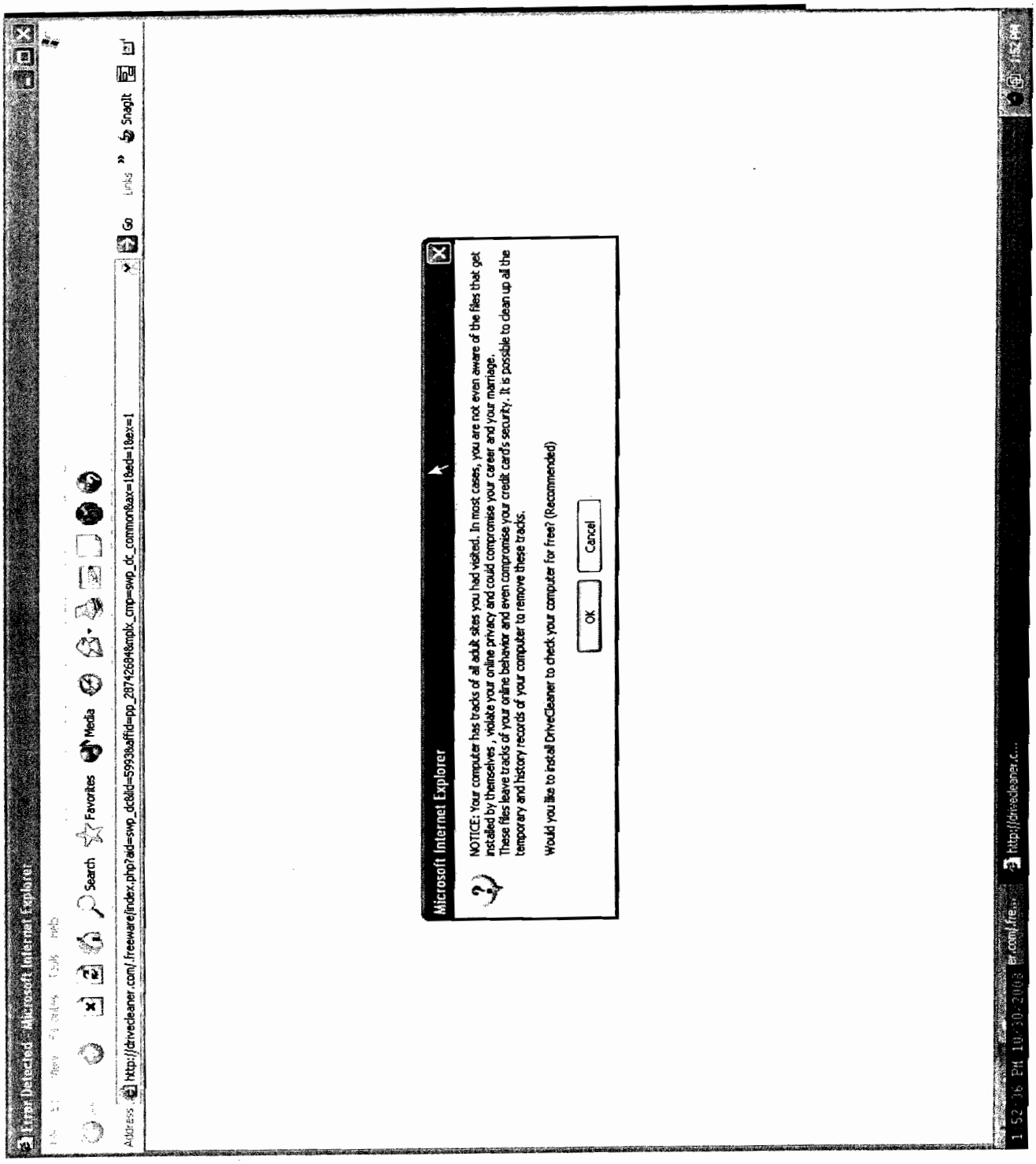
drivecleaner.com/.freeware.. HORRIBLE POP UPS

HELP WITH :
http://drivecleaner.com/.freeware/in...ax=1&ed=1&ex=1
nASTY POP UPS. i CANT SEEM TO GET RID OF THEIS THROUGH SPYWARE, ADAWARE, MICROTRENS HOUSECLEANING OR MY ANTI VIRUS ETRUST.... NOT SURE WHAT TO DO REFFERED TO HERE BY CO WOT\RKER W/ RAVING REVIEWS.....WIN XP, DEL DIMENSION L1000R DESKTOP MULTIPLE ATTEMPTS TO CLEAR...

Last edited by RP69FUN ; 27-Jun-2007 09:20 PM Reason CHANGE TITLE

Tag Cloud

2003 acer audio blue screen boot computer crash dell driver drivers error excel freeze game hard drive install internet internet explorer kb951748 laptop loss of internet malware monitor motherboard network networking outlook outlook express password printer problem problems ram registry router slow software sound sprtcmd.exe trojan update usb video virus vista windows windows xp wireless



Attachment SS

Attachment SS

Drive Cleaner - Microsoft Internet Explorer
File Edit View Favorites Tools Help
Back Search Favorites Media
Address http://drivecleaner.com/.freeware/index.php?mpix_cmp=swp_dc_common&ax=18&lnk=59938&ad=swp_dc_ed18&aff=pp_28742684
Go Links Snagit
DriveCleaner
WARNING!!!
Drive Cleaner found 948 dangerous files in your system
Get rid of them?
Yes
No
COMPROMISING & INTERNET TRACK FILES FOUND: 948
DOWNLOAD
Key Features
Scan and remove compromising files
Keep your hard drive clean
Remove all temporary files
Improve system performance
BEFORE
Before installing DriveCleaner, your computer tracked all of your actions and stored the evidence on your hard drive. Anyone could see where you had been on the Internet, the images you had looked at, the movie you had viewed, etc.
AFTER
Now, with DriveCleaner, you don't have to worry anymore. Once installed, it erases ALL compromising material from your computer, protecting you from spying eyes. Surf the Web with REAL stealth and anonymity.
Copyright © 2008 DriveCleaner Inc. All Rights Reserved. Terms and Conditions | License Information | Privacy Policy
Drive Cleaner - Micro...

New here? Read the forum FAQ before you do anything else.

Help support this site! Click here to learn how

Protect yourself. So how did I get infected in the first place?

CLOSED NEW TOPIC

http://www.drivecleaner.com/.freeware/?, windows 2000 Options

floater Sep 10 2006, 02:10 PM Post #1

Member

Group: Full Member
Posts: 16
Joined: 29-August 06
Member No.: 85,936

Greetings,
I am having adware problems. I have run spybot lava soft adware, and ewido anti spyware. My browser is not hijacked. some adds that constantly popped up are ...
http://www.newsalone.com/m1436101080.html

http://www.drivecleaner.com/.freeware/?p=2...&aid=mgcog4

Attached is my log file from ewido and Hijack this.

Thanks in advance

---

ewido anti-spyware - Scan Report

+ Created at: 11:38:54 AM 9/10/2006

+ Scan result:

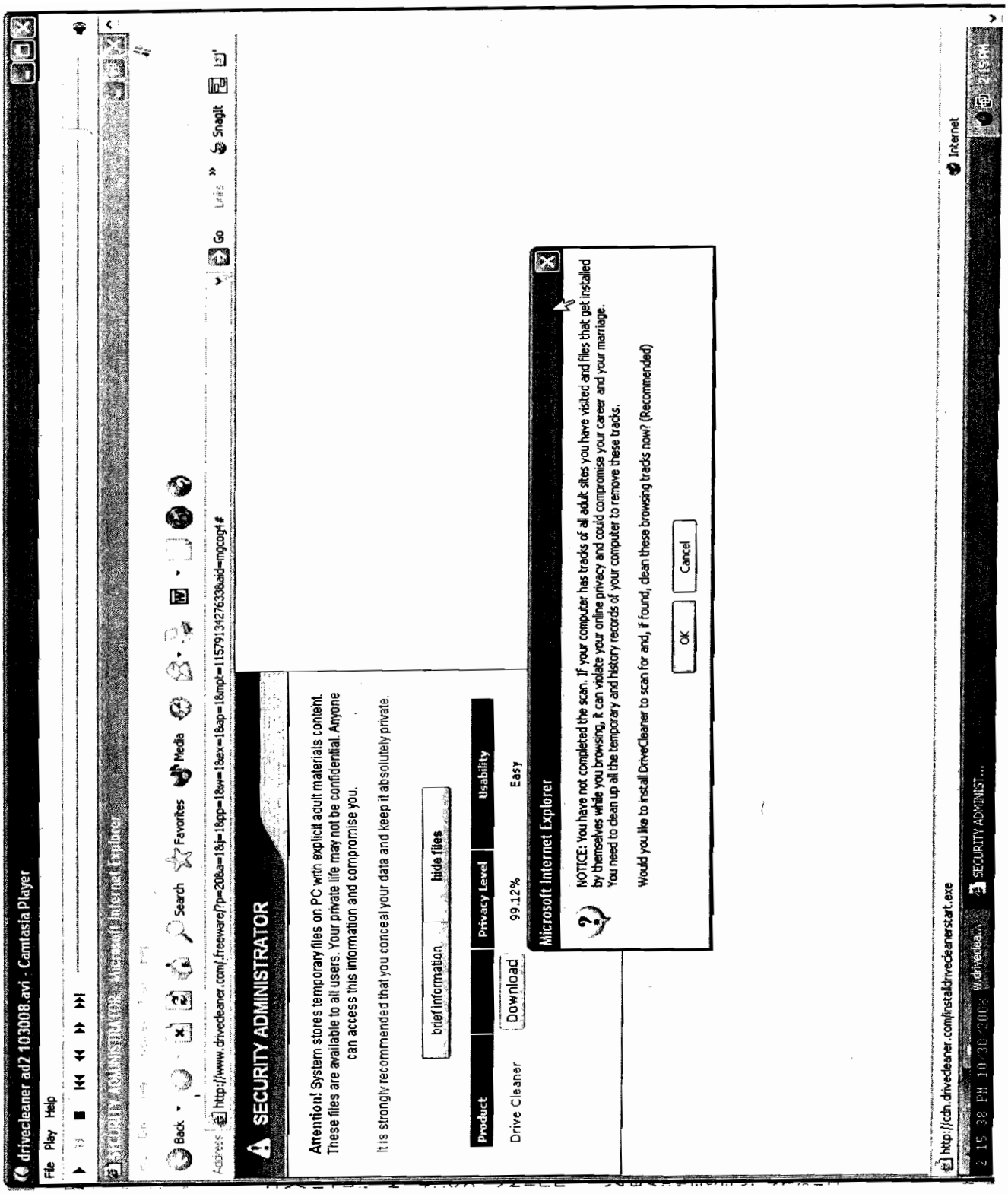
C:\WINNT\thiselt.exe -> Adware.Agent : No action taken.
C:\Program Files\System Files\plugin.dll -> Adware.CASClient : No action taken.

Attachment TT

Attachment TT

Attachment TT

Attachment TT



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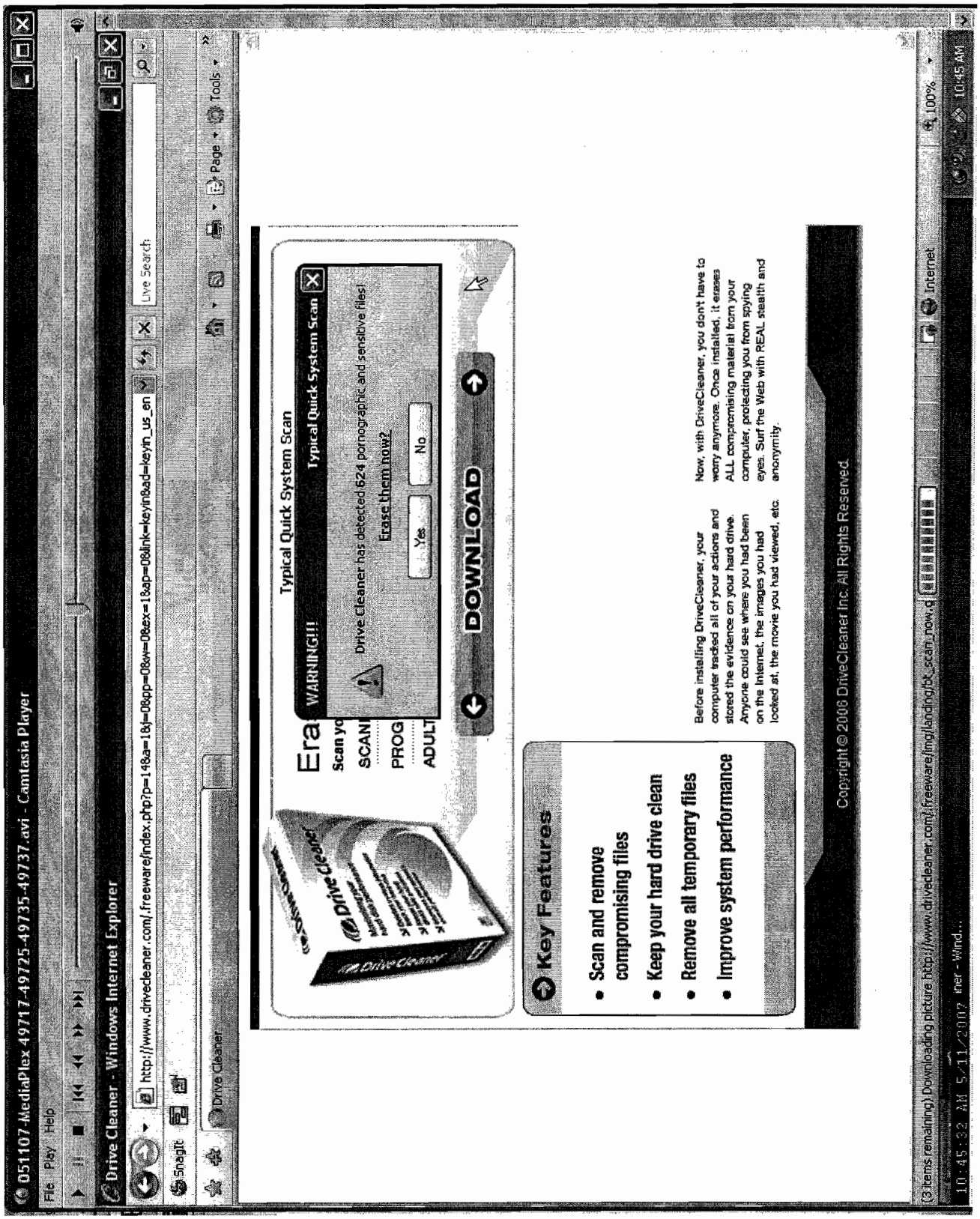
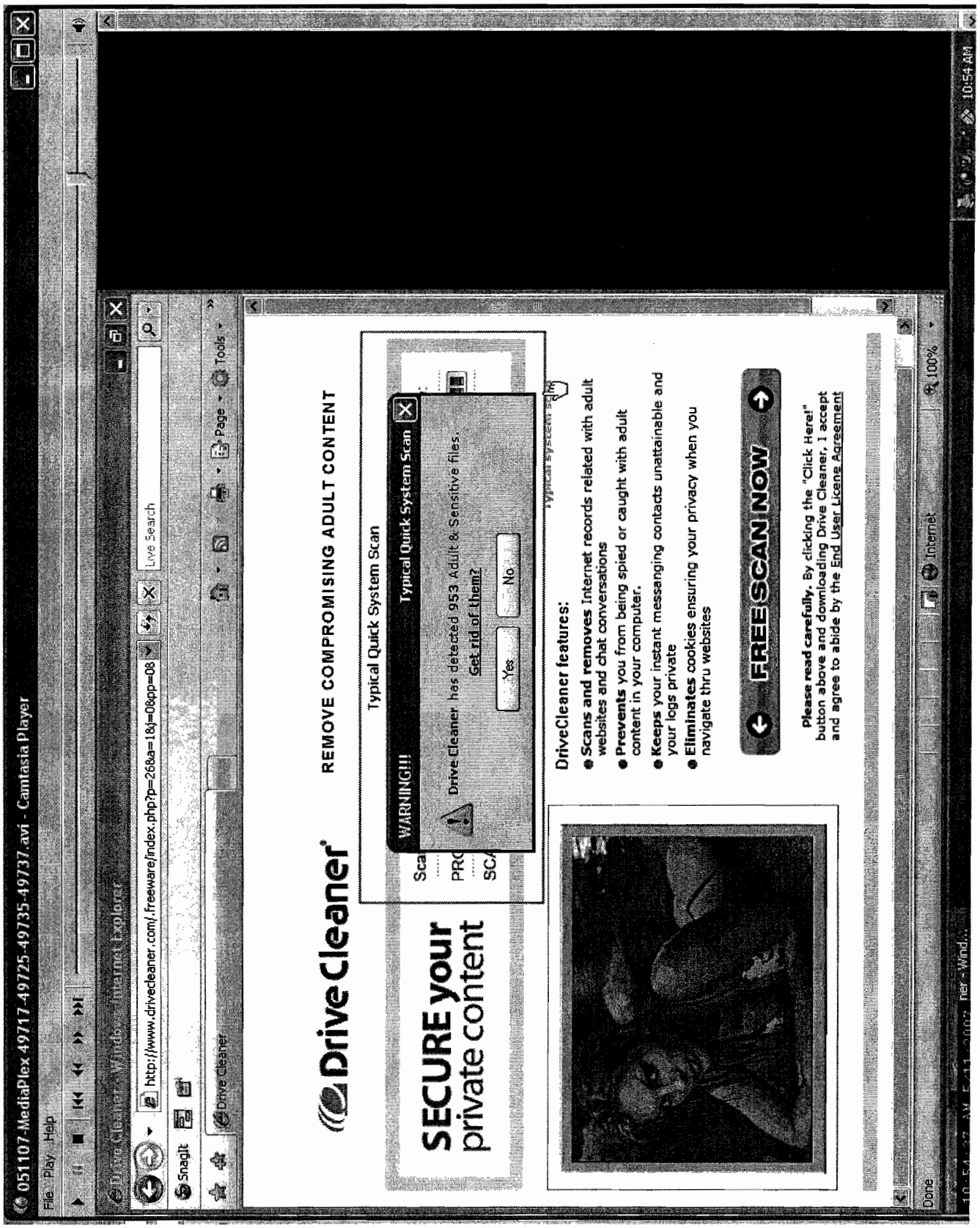


Attachment UU



Attachment UU

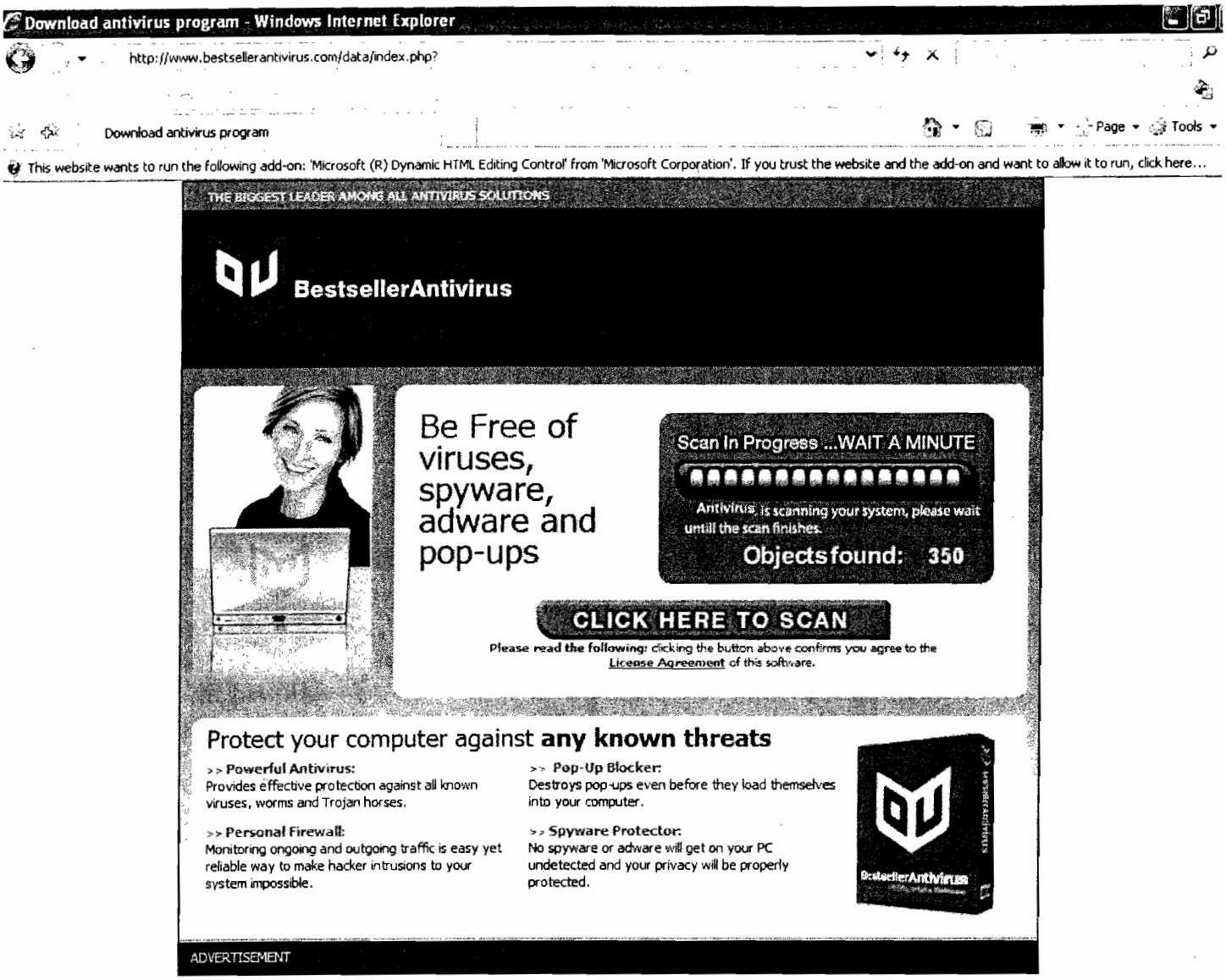
11:37:26 AM 4/28/2008

Attachment VV

11:39:30 AM 4/28/2008

Attachment VV

11:41:01 AM 4/28/2008



Attachment VV

11:50:21 AM 4/28/2008

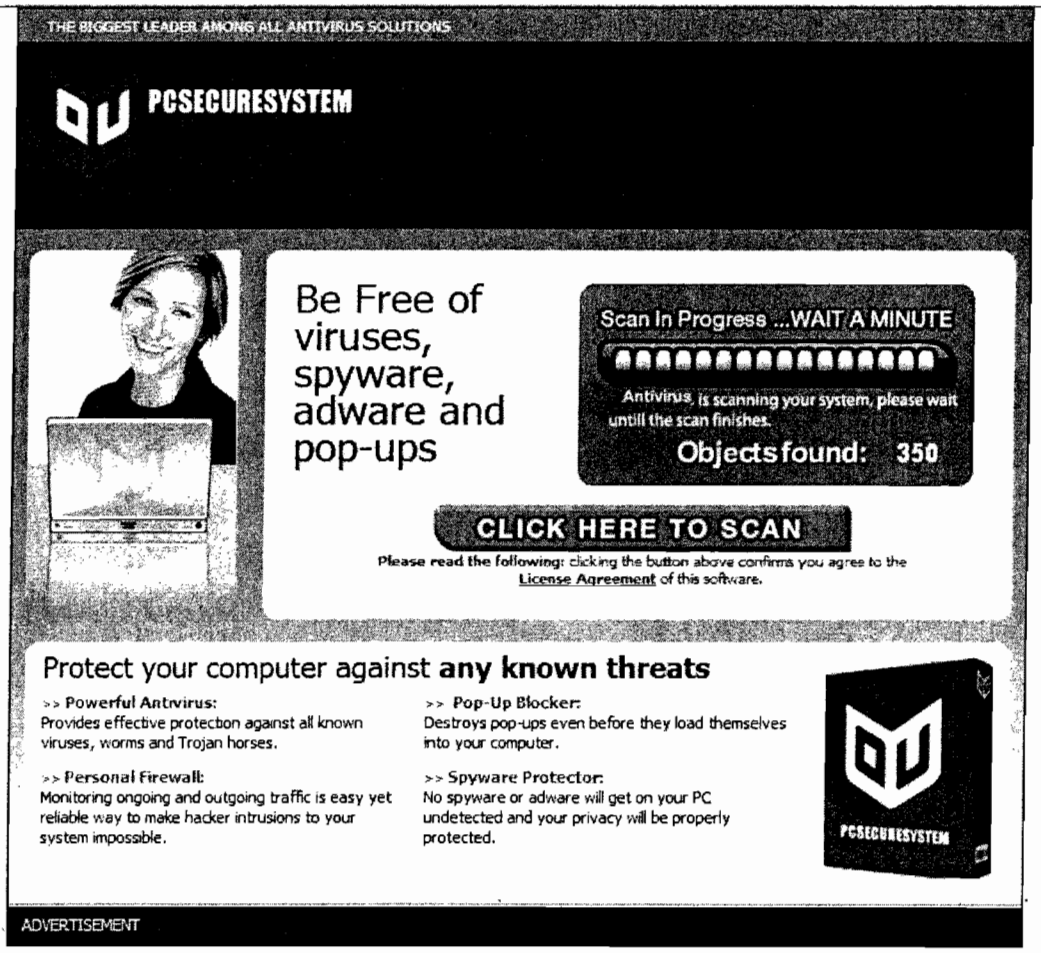
Download antivirus program - Windows Internet Explorer

http://www.pcsecuresystem.com/data/index.php?

Download antivirus program

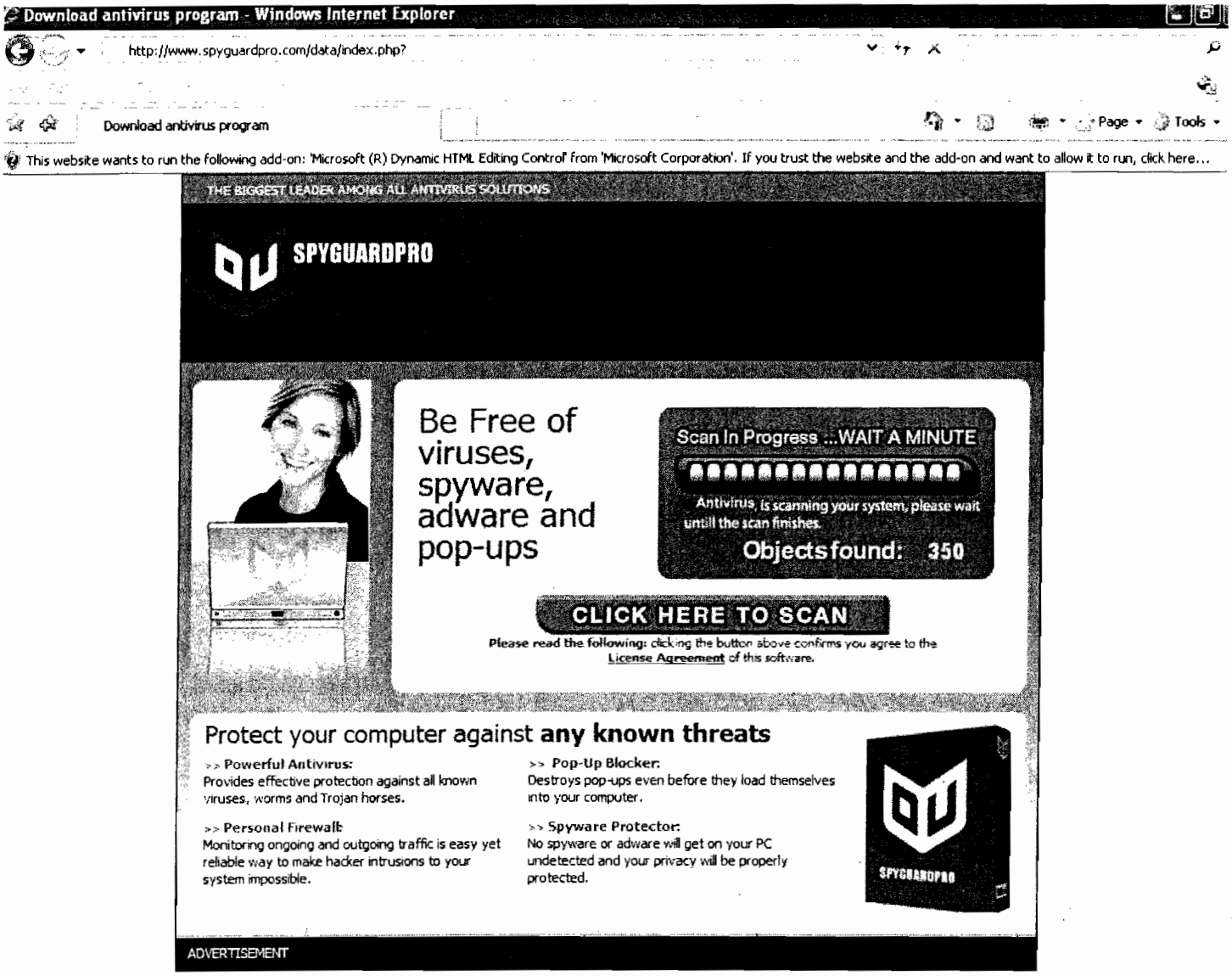
Page Tools

This website wants to run the following add-on: 'Microsoft (R) Dynamic HTML Editing Control' from 'Microsoft Corporation'. If you trust the website and the add-on and want to allow it to run, click here...



Attachment VV

11:51:40 AM 4/28/2008



Attachment VV

11:53:53 AM 4/28/2008

http://www.swiftcleaner.com/

SwiftCleaner Home Page

Page Tools

HOME FEATURES SUPPORT LOGIN BUY NOW

SwiftCleaner
keeping your PC safe

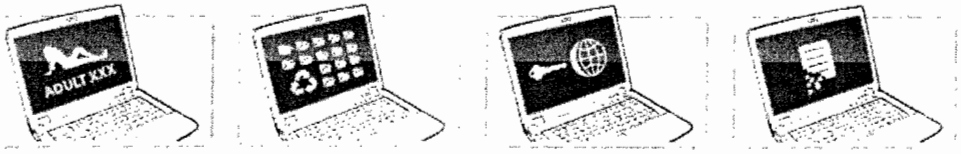
Status: check your PC for compromising material...done

100% Remove All

SCANNING. Temporary Internet Files\coockie:user@youtube
COMPROMISING MATERIALS FOUND: 25

DOWNLOAD SwiftCleaner NOW!

THIS IS HOW COMPROMISING FILES GET STORED IN YOUR COMPUTER!



Web surfing related sites.

While you browse websites, you might receive unwanted contents.

Many files are stored on your hard drive.

Stealth files are downloaded to your hard drive without your permission.

These files show what sites you have visited.

These files leave tracks of your online behavior and even compromise your credit card information.

SwiftCleaner eliminates them all!

Simply deleting these files is not enough. SwiftCleaner really gets rid of them!

THIS IS HOW COMPROMISING FILES GET STORED IN YOUR COMPUTER!

- **Scans and removes** Internet records, temporary files and useless data from your PC.
- **Prevents** you from being spied or caught with inappropriate files in your computer.
- **Keeps** your drive clean and free from useless files improving your system's performance.
- **Erases** instant messaging system's old logs and private conversations.

DOWNLOAD SwiftCleaner NOW!

Terms and Conditions Privacy License

Copyright © 2007 SwiftCleaner

Attachment VV

11:56:40 AM 4/28/2008

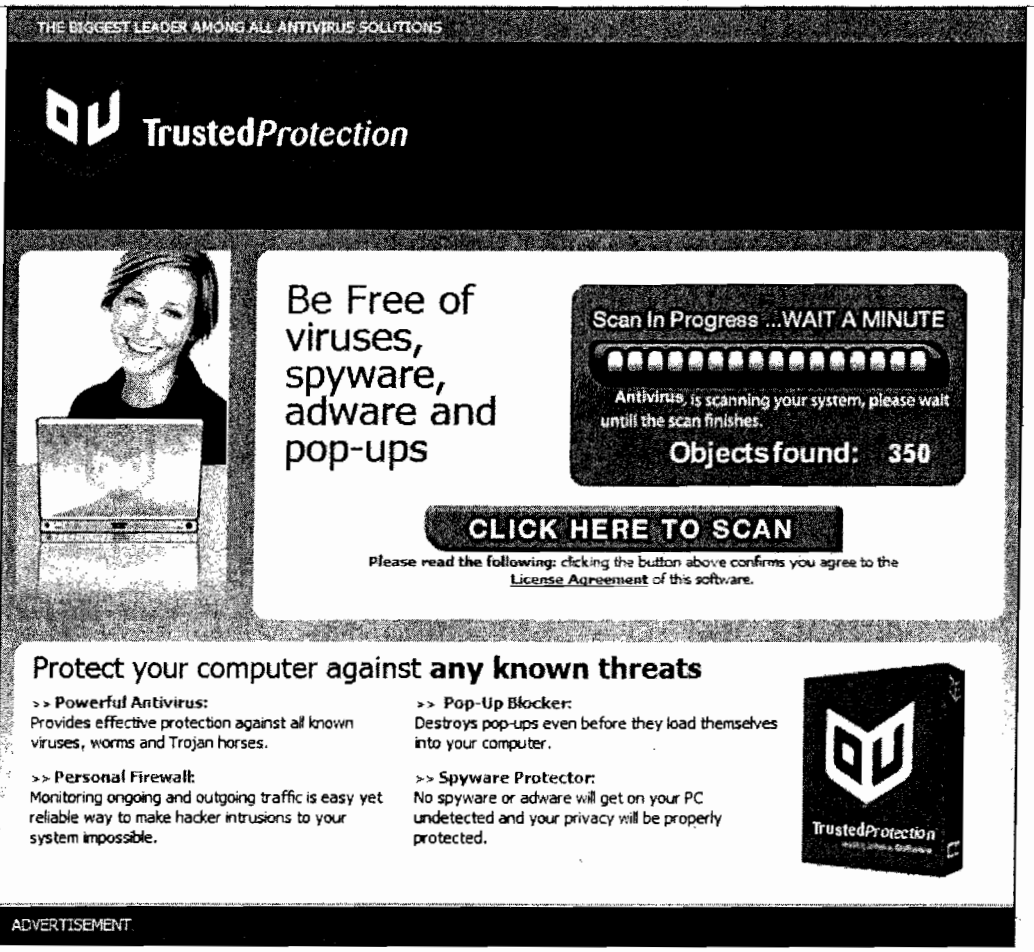
Download antivirus program - Windows Internet Explorer

http://www.trustedprotection.com/data/index.php?

Download antivirus program

Page Tools

This website wants to run the following add-on: 'Microsoft (R) Dynamic HTML Editing Control' from 'Microsoft Corporation'. If you trust the website and the add-on and want to allow it to run, click here...



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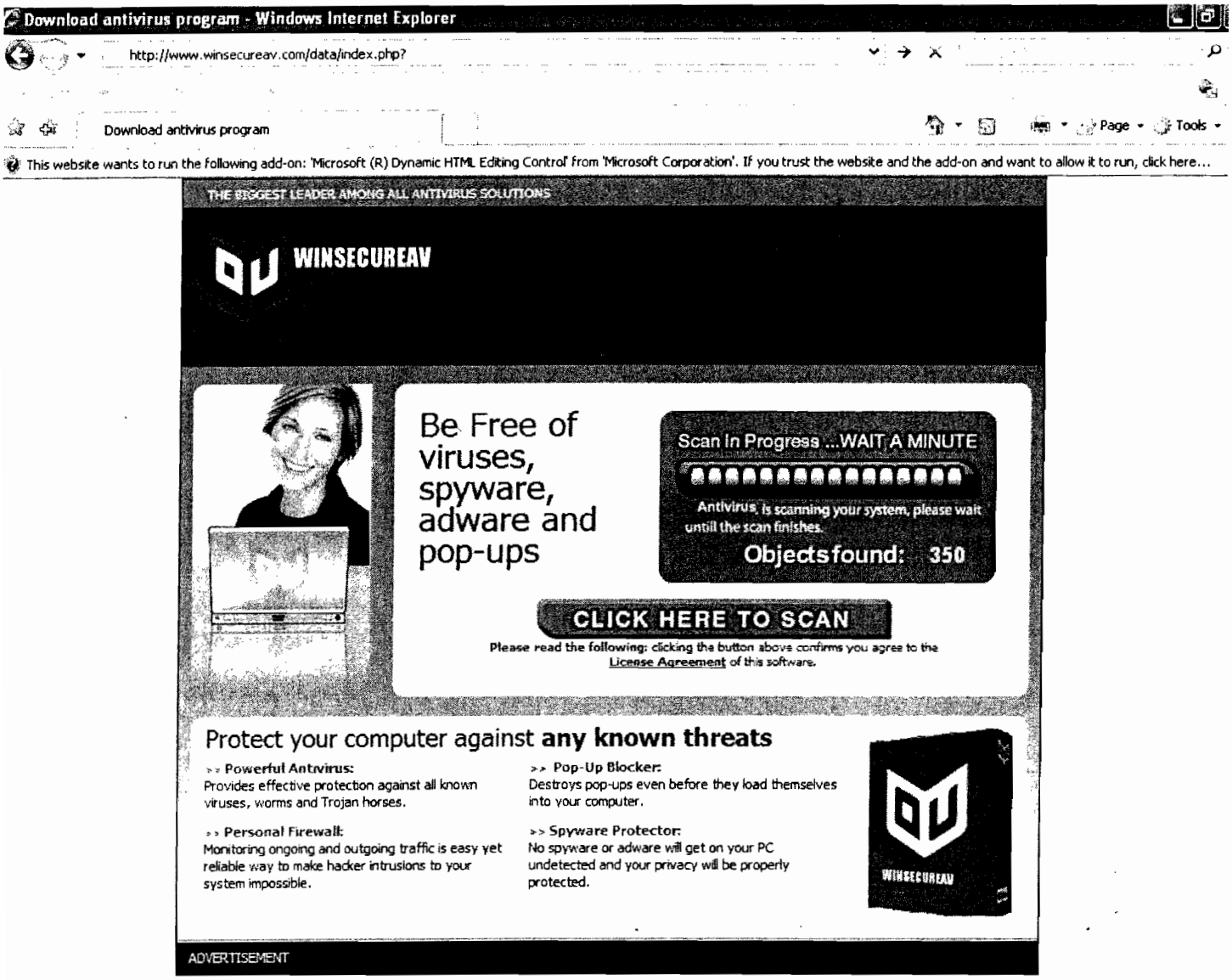
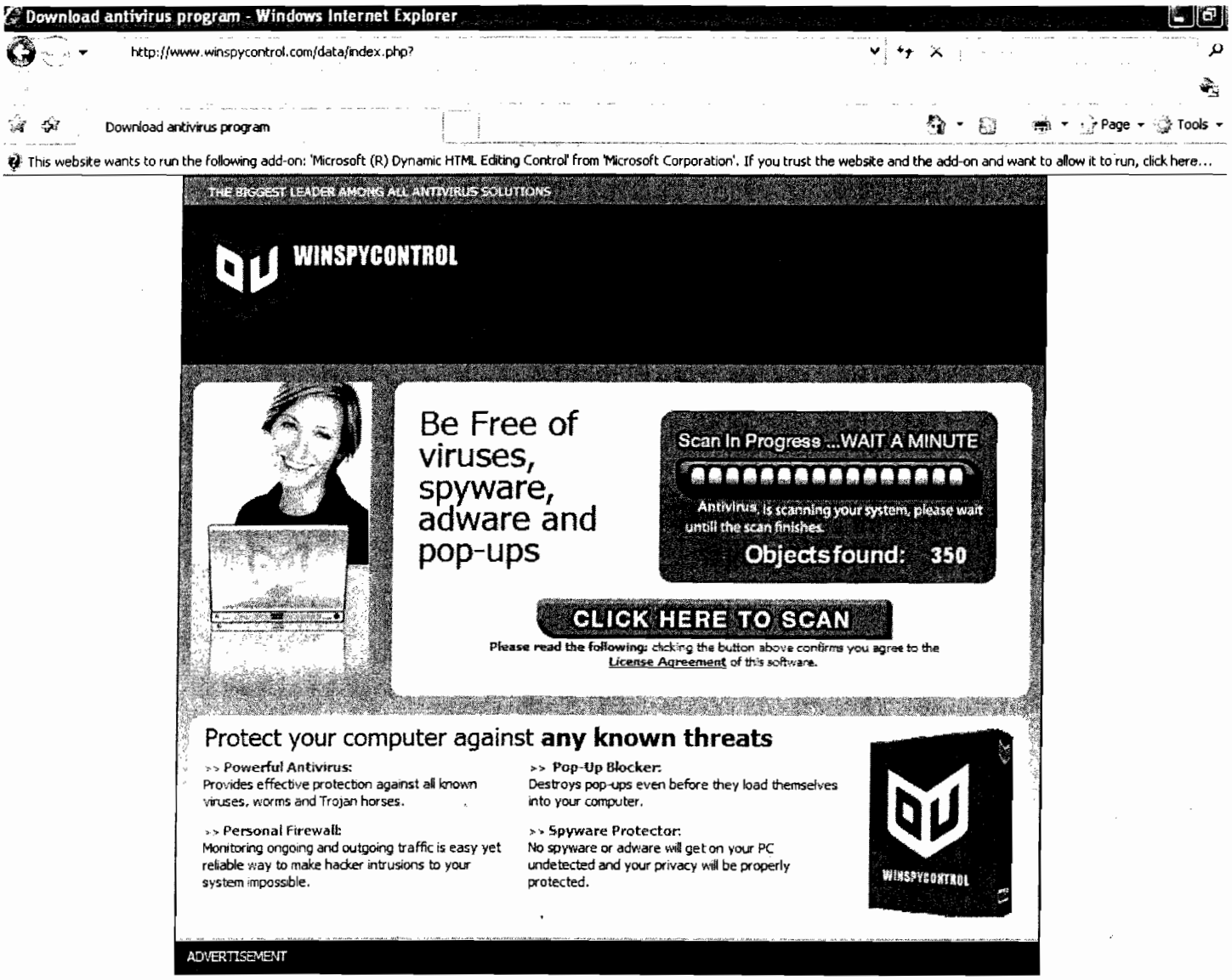
11:58:44 AM 4/28/2008

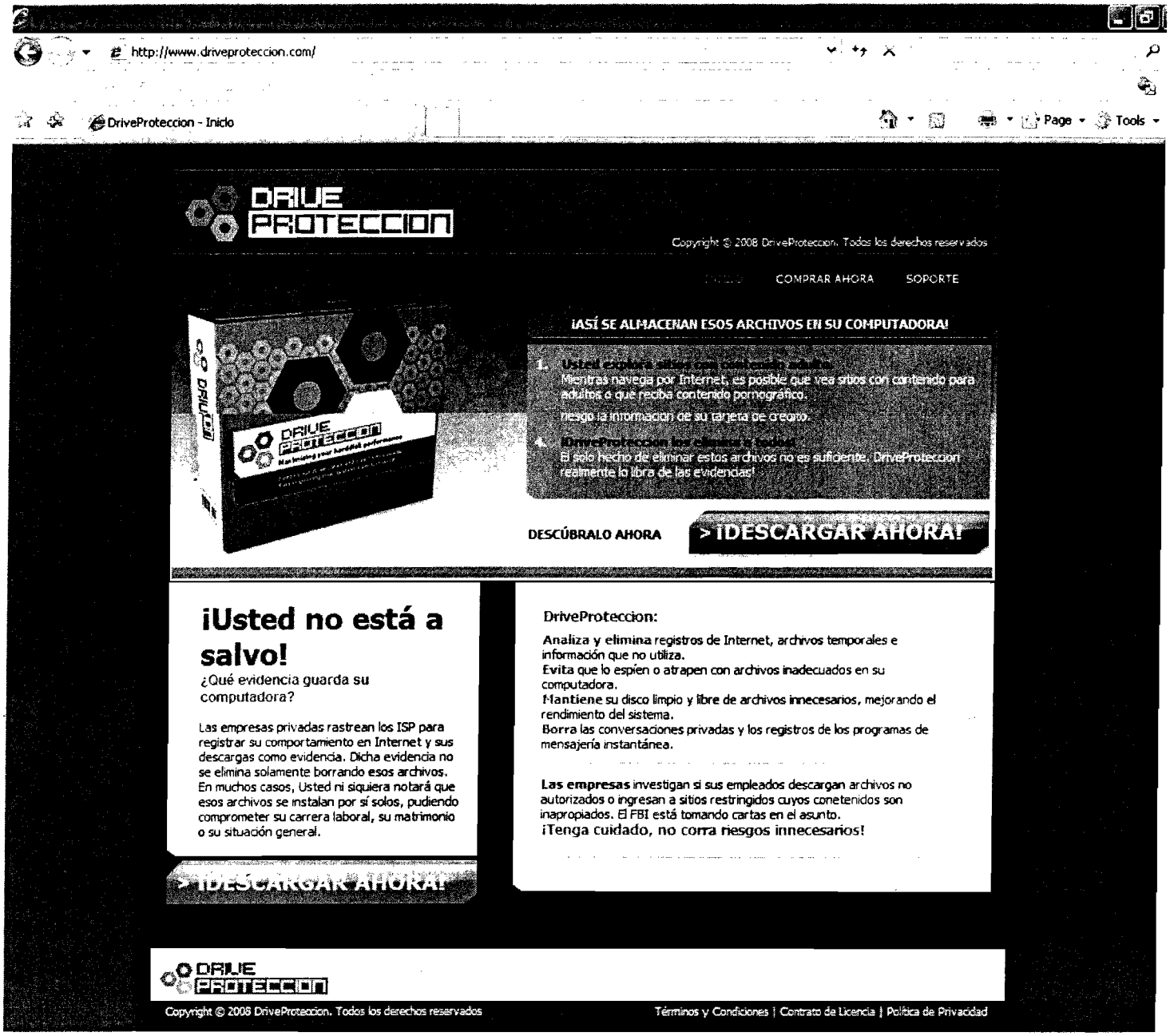


Attachment VV

12:00:23 PM 4/28/2008



Attachment VV



Attachment WW

DiskRetter - Beseitigt Computerprobleme, erhöht die Leistung Ihres PCs, repariert beschädigte D - Windows Internet Explorer

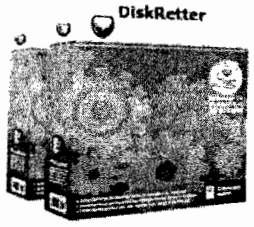
http://www.diskretter.com/

DiskRetter - Beseitigt Computerprobleme, erhöht die L...

Page Tools

DiskRetter

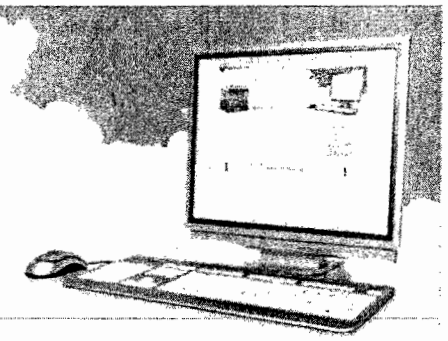
Haus | Sofort Kaufen | Support



Das All-in-One-Paket

VOLLSTÄNDIGE, SCHNELLE
SYSTEMOPTIMIERUNG, SCHUTZ UND
REPARATUR VON SOFTWARESTÖRUNG,
DIE ALLE COMPUTERPROBLEME BESEITIGT

Eine benutzerfreundliche und
mächtige Software, die dafür sorgt, dass Ihre
Laufwerke von den unbenötigten und
beschädigten Dateien bleiben



Das Problem

Es gibt viele unnötige Dateien, die auf Ihrer Festplatte ohne Ihr Wissen gespeichert werden. Sie reduzieren den Speicherplatz und verlangsamen das ganze System. Wissen Sie, dass dieses Programm den verlorenen Speicherplatz wiedergewinnen kann?

Die Lösung

DiskRetter gibt den Benutzern die Möglichkeit alle Daten auf Ihren PC's zu kontrollieren. Das Programm löscht alle unbenötigten Dateien, verhindert den Datenverlust und bereinigt Ihre Festplatte. Möchten Sie verlässliches Laufen Ihres Systems sichern? Keine Fehler auf Ihrem PC haben? Benutzen Sie DiskRetter, um Ihr System zu verbessern.

Schlüsseleigenschaften

Repariert Fehler auf der Festplatte
Verhindert den Daten- und Archivenverlust
Repariert beschädigte Dateien auf Ihren Laufwerken
Löscht die Spuren Ihrer Internettätigkeit

SOFORT DOWNLOADEN!

Den PC verbessern

DiskRetter beginnt seine Arbeit sofort nach dem Download und der folgenden Installation.
Das Programm DiskRetter scannt Ihre Festplatte nach unbenötigten Dateien, ohne Ihnen die Gelegenheit zu stören. Benutzen Sie diese Software und löschen Sie Dateien zu löschen, die Ihr System gefährden.

WER BRAUCHT DiskRetter?

DiskRetter wurde für die Benutzer hergestellt, die alle Ressourcen Ihrer Computer benutzen möchten. Wenn Sie Ihren PC täglich zu Hause oder bei der Arbeit benutzen, ist die Rolle dieser Software nicht zu überschätzen. Dieses Programm bereinigt Ihre Festplatte, sichert verlässlichen Lauf und löscht alle unbenötigten Informationen.

Sofort kaufen | Support

Attachment WW

11:43:05 AM 4/28/2008

DefensaAntiMalware - descargar antivirus - Windows Internet Explorer

http://www.defensaantimalware.com/data/index.php?

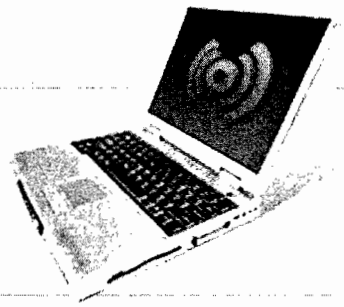
DefensaAntiMalware - descargar antivirus

Page Tools

This website wants to run the following add-on: 'Microsoft (R) Dynamic HTML Editing Control' from 'Microsoft Corporation'. If you trust the website and the add-on and want to allow it to run, click here...

DEFENSAANTIMALWARE

Desháguese de los virus, del software espía y de publicidad y de los pop-ups



Análisis finalizado

Antivirus está analizando su sistema. Por favor, aguarde a que finalice el análisis

Elementos encontrados:128

Este es un ejemplo de analisis tip

HAGA CLIC AQUÍ

Se recomienda leer lo siguiente: al hacer clic en el botón que se encuentra arriba, usted confirma la aceptación del Contrato de licencia para el usuario final de este software.

PROTEJA SU COMPUTADORA CONTRA CUALQUIER AMENAZA CONOCIDA:

Poderoso Antivirus: DefensaAntiMalware brinda protección efectiva contra todo tipo de virus, gusanos y troyanos conocidos.

Firewall Personalizado: Con DefensaAntiMalware puede monitorear fácilmente el tráfico de entrada y de salida para impedir ataques de hackers a su PC

Antiespía: Con DefensaAntiMalware su PC estará libre de software espía y de publicidad y su privacidad estará completamente protegida.

Anti pop-ups: DefensaAntiMalware destruye los pop-ups, incluso antes de que aparezcan en su pantalla.

ADVERTISEMENT

Attachment WW

11:47:01 AM 4/28/2008

http://www.exterminadordevirus.com/data/index.php?

ExterminadorDeVirus - descargar antivirus

This website wants to run the following add-on: 'Microsoft (R) Dynamic HTML Editing Control' from 'Microsoft Corporation'. If you trust the website and the add-on and want to allow it to run, click here...

EXTERMINADOR DE VIRUS

Deshágase de los virus, del software espía y de publicidad y de los pop-ups

Análisis finalizado

Antivirus está analizando su sistema. Por favor, aguarde a que finalice el análisis

Elementos encontrados:128

HAGA CLIC AQUÍ

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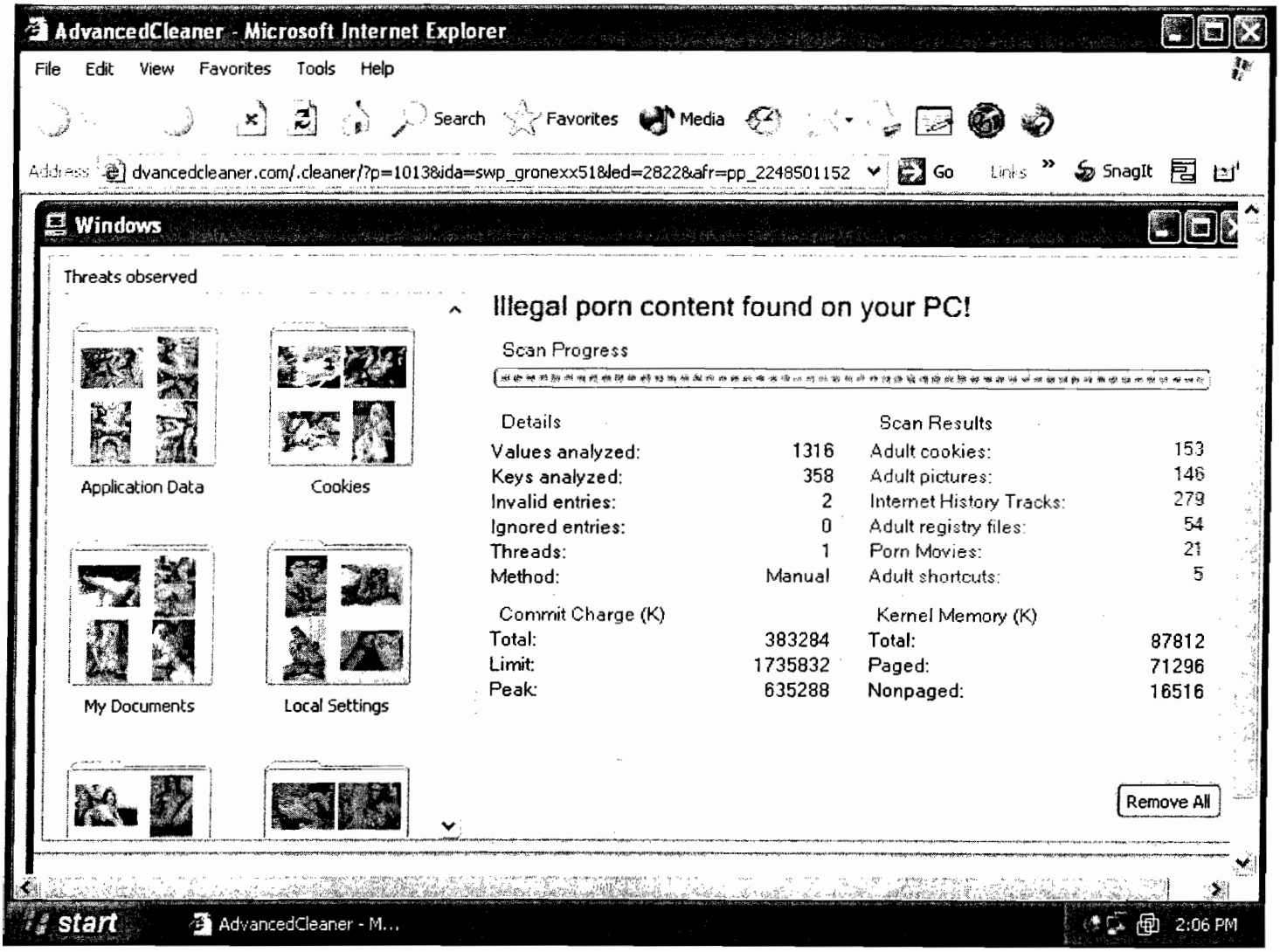
Antiespía: Con ExterminadorDeVirus su PC estará libre de software espía y de publicidad y su privacidad estará completamente protegida.

Anti pop-ups: ExterminadorDeVirus destruye los pop-ups, incluso antes de que aparezcan en su pantalla.

ADVERTISEMENT

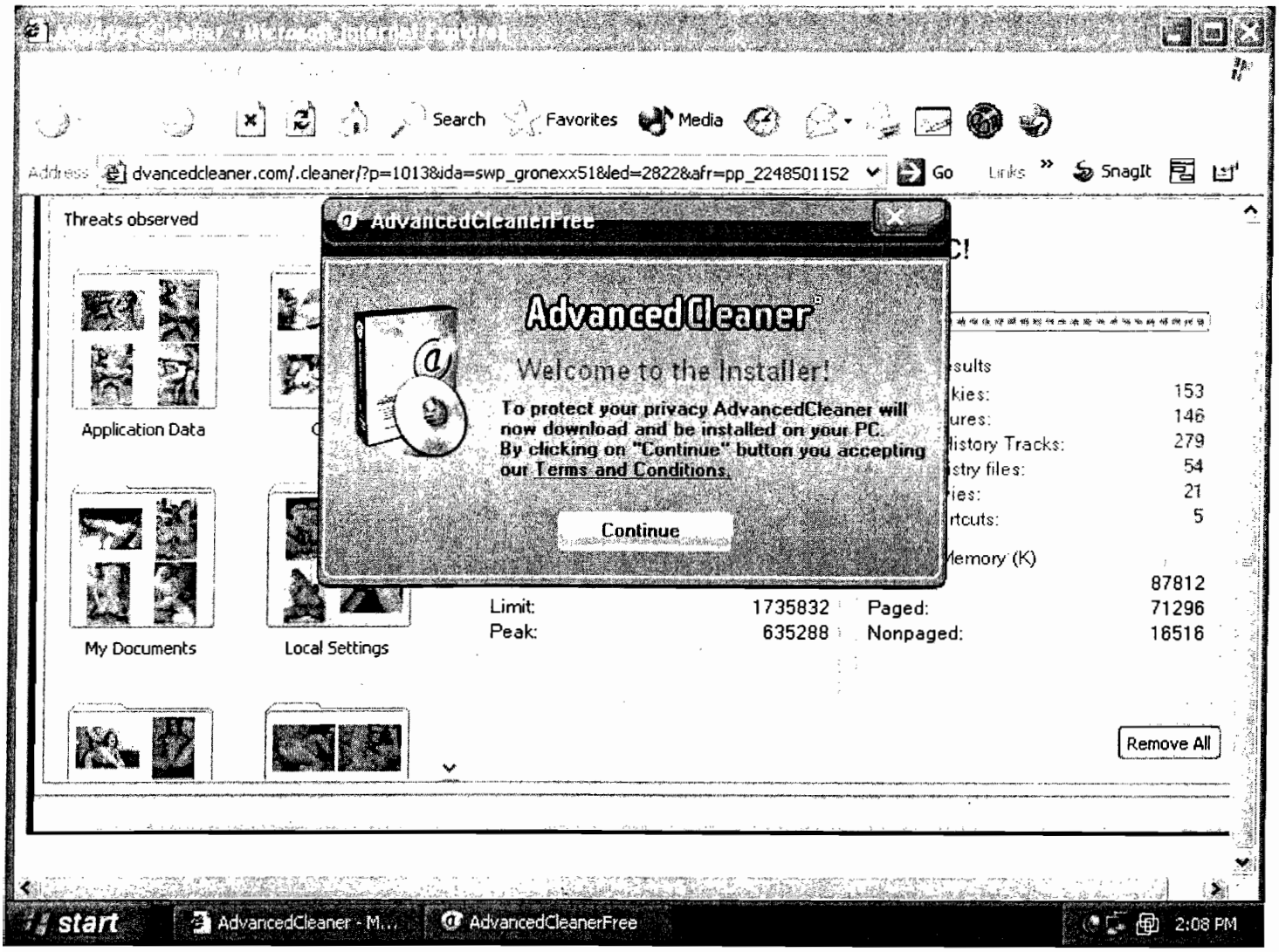
Attachment WW

2:06:54 PM 3/12/2008



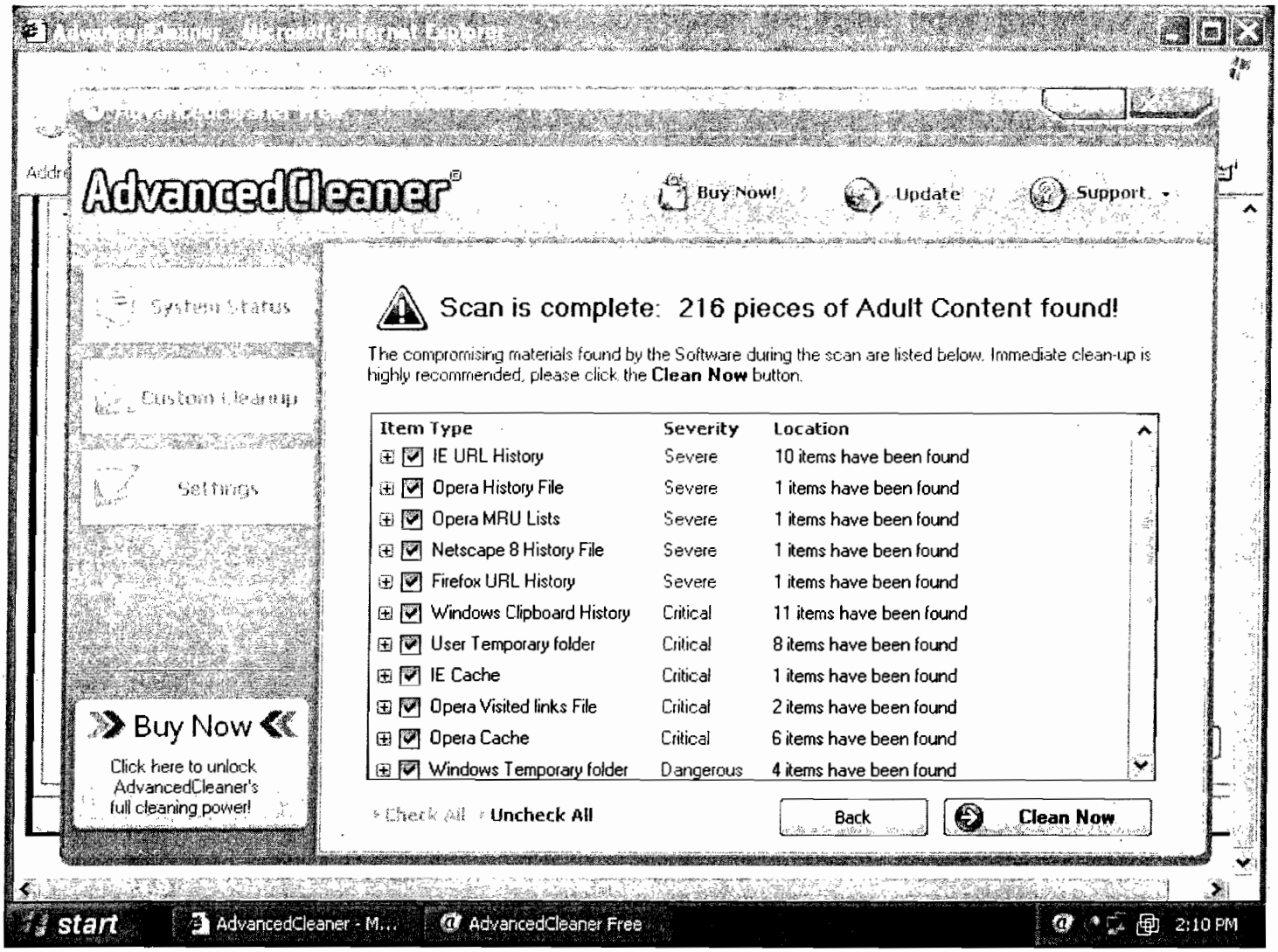
Attachment XX

2:08:04 PM 3/12/2008



Attachment XX

2:10:36 PM 3/12/2008



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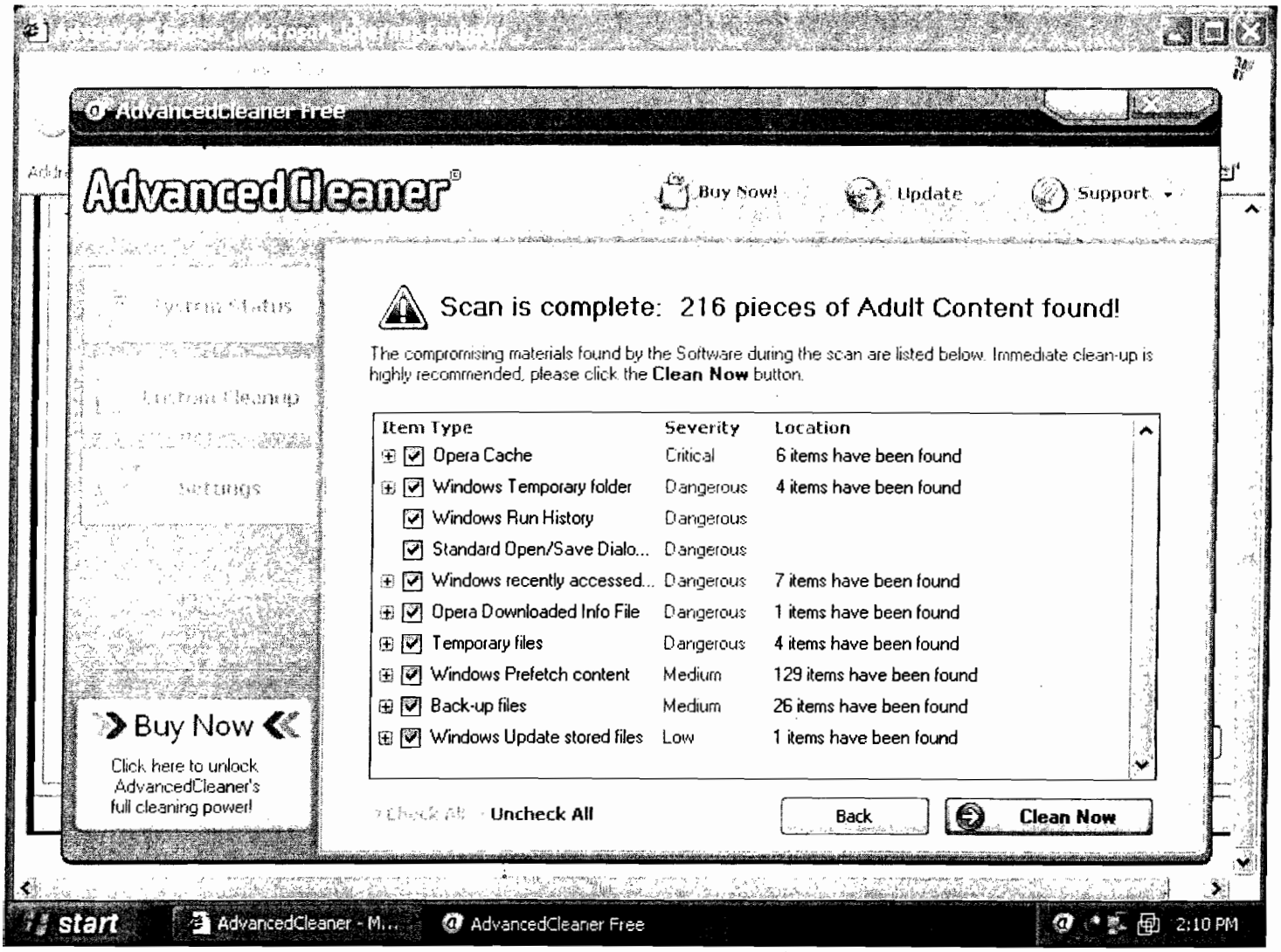
2:10:49 PM 3/12/2008



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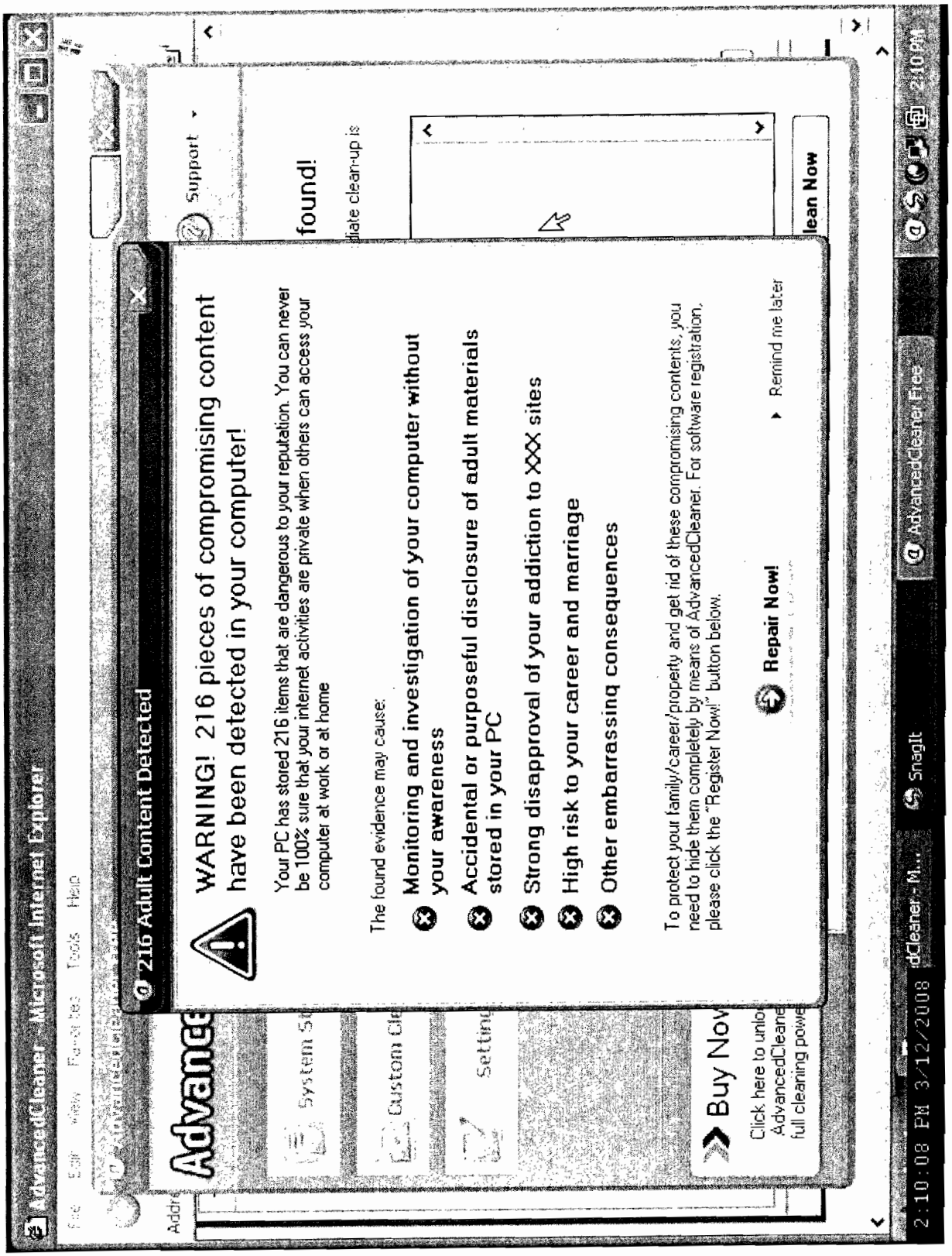

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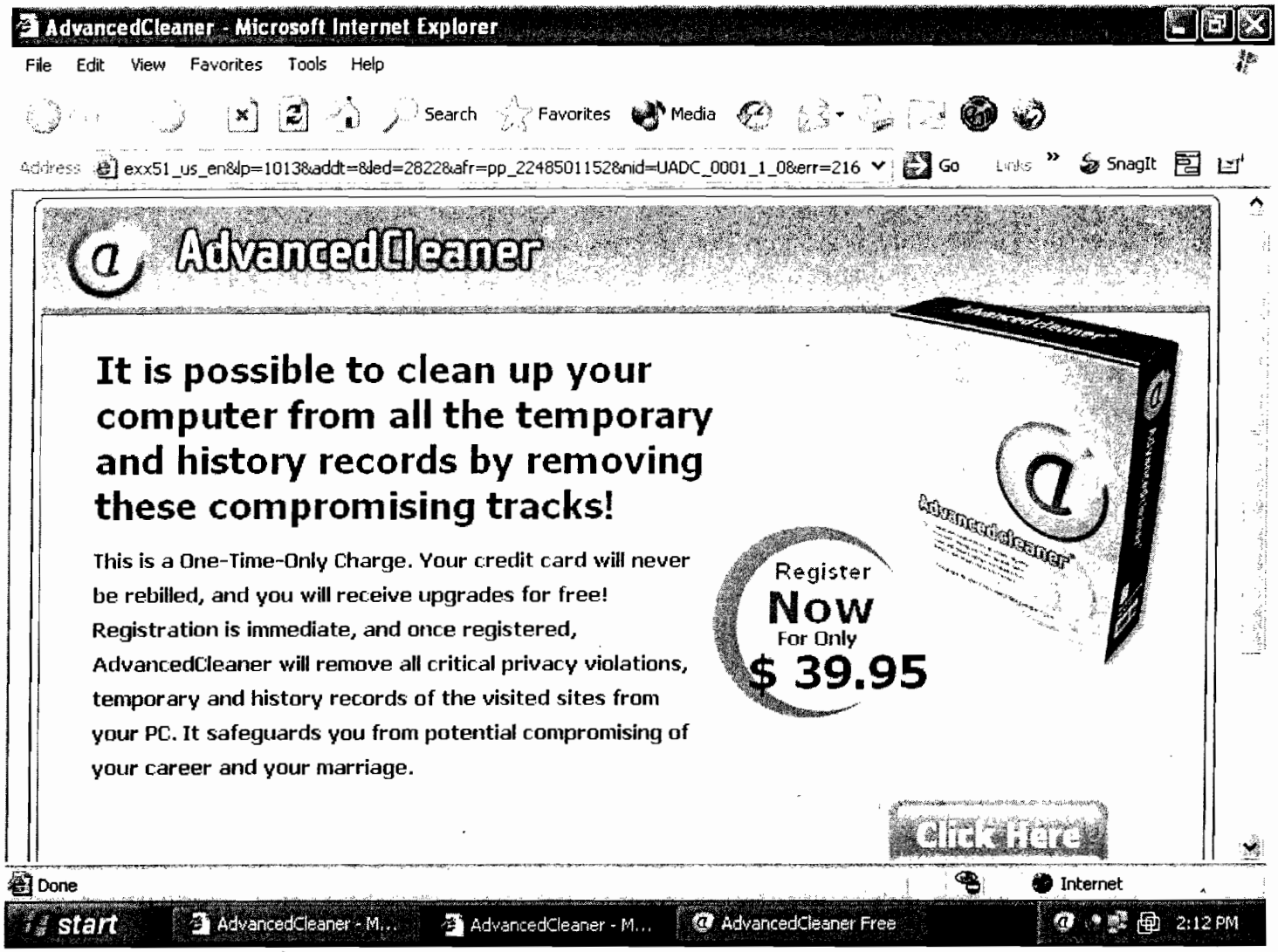
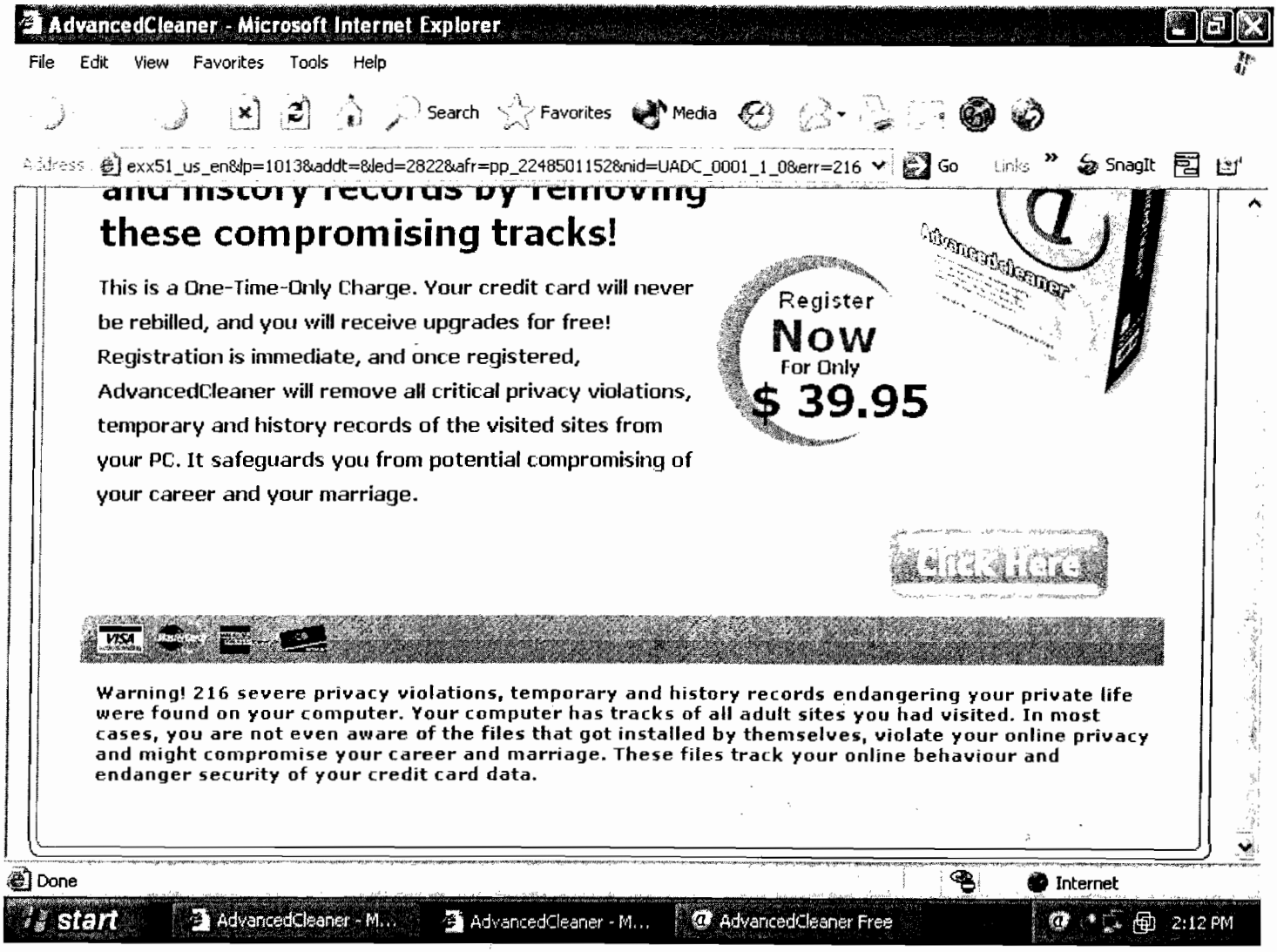


Attachment XX

2:12:22 PM 3/12/2008



Attachment XX

AdvancedCleaner

Your Payment Information

Payment Type Credit Card

Card Number

Expiration Date -- --

CVV2 Number What is CVV?

Your Name and Address

Name

Email ID

Address

City

Country United States

Telephone

Password

◉ Generate

○ Let me enter

*Items in **bold** are required. Information is needed for credit card verification even for download orders. It is never shared with other companies.*

Fully Secure & Encrypted O
Safer Than Over the Phone.

Your Purchase is Backed B
Money Back Guarantee!

Your Email Address and Pe
are private and NEVER reso

Terms
You are purchasing AdvancedCleaner
This is a one-time charge and you wi

SECURE PURCHASE

☑ Check here to certify you agree to the Terms & Conditions

☑ Sign me up for an upgrade to **InternetAnonymizer** - Protect your privacy and identity. You will be billed one-time charge of only **USD 30**.

☑ I want to have **Premium Support** with dedicated support manager, remote control system & instant messaging consultant + call back service 24&7 ONLY for **USD 24.95**

IMPORTANT: Please allow up to **two minutes** for the live processing of your order. Dont click **BACK CANCEL**. By clicking SECURE PURCHASE you agree that you have read, understood, and accept the Sof License Agreement.

Attachment XX

Order placed: 2008-03-12
advancedcleaner.com

ORDER #: 6153843

Shipping Adress:	**Items Ordered**	**Price**
Jessie Logan [redacted] United States	1. AdvancedCleaner + Premium Support	64.90 USD
	- 1 item(s) Gift options: None	
Shipping: Standard	**Item(s) Subtotal**	64.90 USD
	Shipping & Handling:	USD 0.00
	Subtotal	64.90 USD
	Total for this Shipment	64.90 USD

Your charge will appear as: **supportsw.com 8007555909**

PAYMENT INFORMATION

Payment Method:		
visa Authorization code: 18468530 Last 4 digits: 0005 Transaction Type: Purchase	Item(s) Subtotal	64.90
	Shipping & Handling:	USD 0.00
	Total Before Tax	64.90
Billing Adress: Jessie Logan [redacted] United States	Estimated Tax	0
	Grand Total	64.90 USD

In case of any problems with AdvancedCleaner + Premium Support customer should contact the Customer Support service.
Declaring a refund is NOT possible without contacting our Customer Support Department.
See our Refund Policy.

Questions?
e-mail: support@advancedcleaner.com
CUSTOMER SUPPORT
+1. (202) 904-2212 (24/7 Phone Support)
+1. (800) 755-5909 (24/7 Toll-Free USA Phone Support)
+1. (800) 889-5113 (24/7 Toll-Free Canada Phone Support)
+61 (290) 372-132 (24/7 Phone Support Australia)
+44 (120) 925-01-11 (24/7 Phone Support UK)

User details:
Login: jelogs@gmail.com
Password: [redacted]

Member's Area: http://advancedcleaner.com/members/login.html